

ENVIRONMENT & HEALTH

March 11, 2024

Ms. Rhonda Romero Minor Source Manager New Mexico Environment Department, Air Quality Bureau, Permits Section 525 Camino de los Marquez, Suite 1 Santa Fe, NM 87505

#### MINOR NSR SOURCE PERMIT REVISION APPLICATION GREATER KUDU LLC – LOS LUNAS, NEW MEXICO

Dear Ms. Romero:

Ramboll is submitting the enclosed Minor New Source Review (NSR) Permit Revision Application to the New Mexico Environment Department (NMED) on behalf of our client, Greater Kudu LLC, for revisions to the permit for their facility in Los Lunas, New Mexico (Permit No. 7026-M5, issued by the NMED on June 11, 2021). The application filing fee for the application is included in **Attachment 1**.

Certain items within the application have been redacted from the public portion of the application pursuant to a claim of confidentiality. The applicant's request for confidential protection under 20.2.1.115 of the New Mexico Administrative Code (NMAC) is included in **Attachment 2**.

We appreciate NMED's prompt review of the enclosed application documents. If you have any questions, please feel free to contact us at your convenience.

Date March 11, 2024

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Yours sincerely,

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# Attachment 2

Request for Confidential Information Protection

#### CONFIDENTIAL BUSINESS INFORMATION/TRADE SECRET CONTAINS TRADE SECRETS PROTECTED UNDER NMSA 1978, SECTIONS 57-3a-1 THROUGH 57-3a-7, NMSA 1978, SECTION 14-2-1 AND 20.2.1.115 NMAC

#### SUBJECT TO NEW MEXICO SUPREME COURT RULE 11-508

March 11, 2024

Ms. Rhonda Romero Minor Source Manager New Mexico Environment Department, Air Quality Bureau, Permits Section 525 Camino de los Marquez, Suite 1 Santa Fe, NM 87505

#### **REQUEST FOR CONFIDENTIAL INFORMATION PROTECTION**

Dear Ms. Romero,

Greater Kudu LLC (the applicant) is submitting a Minor New Source Review (NSR) Permit Revision Application to the New Mexico Environmental Department (NMED) to revise the permit for its data center in Los Lunas, New Mexico. Certain items included within the application are applicant trade secrets and other confidential business information; specifically, information related to the capacity and throughput of its emissions units (i.e., emergency generator engines and diesel belly tanks).

The applicant is requesting confidential protection of its trade secrets and confidential business information under 20.2.1.115 of the New Mexico Administrative Code (NMAC). In accordance with 20.2.1.115.B(1) NMAC, all items within the construction permit application that are claimed by the applicant as trade secrets and confidential business information are included in the appendices to the application, with each page containing confidential information marked as "Confidential."

#### **Confidentiality Request**

The NMAC defines confidential business information as "information that, if made public, would harm a business' competitive position. This includes trade secrets and may include data relating to the profits and costs of the owner or operator which have not previously been released to the public." The NMAC defines trade secret as "a secret plan or process, tool or mechanism unique to the owner or operator of a business."<sup>1</sup> The following sections outline the applicant's confidentiality claim of its trade secrets and confidential business information and demonstrate that the request satisfies the conditions of 20.2.1.115B.(3) NMAC.

# (a) The claimant has asserted a claim of confidentiality which has not been waived, withdrawn, or denied.

This is the seventh confidential claim requested by the applicant of NMED. Each of the applicant's previous requests were granted approval by NMED. No previous claims by the applicant have been waived, withdrawn, or denied by NMED.

<sup>&</sup>lt;sup>1</sup> 20.2.1.115A.(5) NMAC

#### CONFIDENTIAL BUSINESS INFORMATION/TRADE SECRET CONTAINS TRADE SECRETS PROTECTED UNDER NMSA 1978, SECTIONS 57-3a-1 THROUGH 57-3a-7, NMSA 1978, SECTION 14-2-1 AND 20.2.1.115 NMAC

#### SUBJECT TO NEW MEXICO SUPREME COURT RULE 11-508

# (b) The claimant has satisfactorily shown that it has taken reasonable measures to protect the confidential measures, and that it intends to continue to take such measures.

The applicant has not disclosed the capacity or throughput of its emissions units in any other requests for permits or licensures from the state of New Mexico, Valencia County, the Village of Los Lunas, or any other government entity, nor has it disclosed such information to other entities or individuals not associated with the applicant. The applicant does not have plans to disclose such information in the future to any entity or individual not associated with the applicant. Also, the applicant does not disclose this information publicly in its press releases, brochures, website, or other documentation, nor does it have plans to do so.

# (c) The information is not, and has not been, reasonably attainable without the business' consent.

Information related to the capacity and throughput of the emergency generator engines and diesel belly tanks is not reasonably attainable through viewing aerial photographs of the site, building layouts, or images of the site taken from publicly accessible locations. As such, it is the applicant's belief that this information cannot be reasonably attained by the public without the company's consent.

# (d) The claimant has satisfactorily shown that disclosure of the information is likely to cause substantial harm to the business' competitive position.

Information related to the capacity and throughputs of the emission units at the facility could provide the applicant's competitors an understanding of the size and power usage of its data center, which would give the company's competitors valuable insight into its operations and how it stores and maintains its data. The applicant invests significant time and money into research and development in order to continually improve its data center operations, and the release of information regarding its emission units could result in significant financial losses if obtained by one of the applicant's competitors, and could put the company at a competitive disadvantage.

The applicant appreciates NMED's review of this claim of confidentiality. If you have any questions, please contact Eri Ottersburg, Ramboll, at (206) 336-1677.

Yours sincerely,

Kathy Rushmore Authorized Representative Greater Kudu LLC

Intended for New Mexico Environment Department - Air Quality Bureau

Date March 2024

# MINOR NSR PERMIT REVISION APPLICATION GREATER KUDU LLC



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Redline of Requested Revisions to NSR Permit No. 7026-M5

#### **APPENDIX 5**

Renewable Diesel Fuel Specifications

#### **APPENDIX 6**

Confidential Business Information

# **1. INTRODUCTION**

Greater Kudu LLC (the applicant) owns and operates a facility in Los Lunas, Valencia County, New Mexico. The applicant is requesting revisions to the facility's current New Source Review (NSR) Minor Source Construction Permit (Permit No. 7026-M5) in accordance with the requirements in Title 20, Chapter 2, Part 72 (20.2.72) of the New Mexico Administrative Code (NMAC). Permitted sources at the facility currently include 118 stationary and two temporary, portable diesel-fired emergency generators.

The applicant is proposing certain design changes, which impact the facility's New Source Review (NSR) Permit. Specifically, the applicant is proposing to: (1) change the make and model of two of the Group 2 generators and designate these as *new* Group 6 generators and (2) allow the use of both ultra-low sulfur fuel (ULSD) and renewable diesel conforming to EN15940 and ASTM D975 specifications for petroleum, including hydrotreated vegetable oil (HVO), in all emergency generators. The applicant also proposes to install and operate a third diesel-fired fire water pump, which is exempt from permitting per 20.2.72.202.A(4) NMAC.

This application includes the following appendices:

- Appendix 1. Site Location and Layout;
- Appendix 2. NMED Application Forms;
- Appendix 3. Detailed Emissions Calculations;
- Appendix 4. Redline of Requested Revisions to NSR Permit No. 7026-M5;
- Appendix 5. Renewable Diesel Fuel Specifications; and,
- Appendix 6. Confidential Business Information

# 2. SUMMARY OF PROPOSED CHANGES

The following sections outline the facility's proposed design changes since the issuance of the facility's existing NSR Permit (Permit No. 7026-M5) and the requested revisions to the permit.

#### 2.1 Proposed Changes to Emergency Generators

The applicant is currently authorized to install 118 engines comprising of **five** different groupings (plus two temporary, portable diesel-fired emergency generators). With this permit revision, there will be no changes to the total number of generators, but the generators will be comprised of **six** different groupings (plus two temporary, portable diesel-fired emergency generators). The applicant is proposing to remove two engines currently permitted as **Group 2** engines and add two new engines that will be classified as a new type of engine (i.e., "**Group 6**" engines) as they will be a different make and model from the currently permitted engines at the facility. The facility will remain subject to a federally-enforceable nitrogen oxides (NO<sub>X</sub>) emission limit of 99.9 tons per year (tpy) and a federally-enforceable carbon monoxide (CO) emission limit of 99.9 tpy from the entire facility to maintain site-wide NO<sub>X</sub> and CO emissions below the Title V major source threshold of 100 tpy.

The proposed changes to the emergency generators are summarized in **Table 1**. There are no changes to the regulatory applicability for emissions sources at the site, and the applicability of site operations to federal and state regulations is discussed further in **Section 4**.

#### 2.2 Requested Revisions to Current Permit Conditions

The applicant is requesting the following revisions to the current Permit conditions:

#### • Table A104.A, Regulated Sources List

The applicant is requesting to remove 2 emergency generators from the **Group 2** engines and add 2 emergency generators under a new grouping, **Group 6**. A summary of the proposed changes is provided in **Table 1**.

#### • Condition A105, Facility Control Equipment

The new **Group 6** engines will be equipped with Selective Catalytic Reduction Systems (SCRs) for control of NO<sub>X</sub> emissions. The applicant requests that these SCRs be listed in Condition A105 for clarity.

#### • Condition A110.A, Facility: Fuel and Fuel Sulfur Requirements

The applicant is requesting to burn renewable diesel, in addition to ULSD, in its generators. The applicant requests to update the language in this condition to include renewable diesel.

# • **Condition A601.E, 40 CFR 60, Subpart IIII (Emergency Generators)** The applicant is requesting to update this condition to align with the federal definition of emergency generators under 40 CFR 60, Subpart IIII.

In addition to these requested revisions to the current permit, the applicant requests to update the permit to incorporate the **Group 6** generators into all relevant permit conditions. A redline markup version of the affected conditions in the facility's current NSR Permit is provided in **Appendix 4**.

Generator Group	Currently Permitted Generators	Proposed Changes	Total Number of Generators in Group	SCRs?
Group 11	VLL1EG-1 through VLL1EG-12, VLL1EG-1R, VLL1EG-2R, VLL2EG-1 through VLL2EG-12, VLL2EG-N1 through VLL2EG-N4, VLL2EG-1R, VLL2EG-2R	No Changes	32	No
Group 2	VLL1EG-N1 through VLL1EG-N4	VLL1EG-N1, VLL1EG-N2 (i.e., remove VLL1EG-N3 and VLL1EG-N4)	2	No
Group 3	VLL1EG-A1 VCN1EG-A1	No Changes	2	No
Group 4 with original parameters	VLL3EG-1 through VLL3EG-12, VLL3EG-N1 through VLL3EG-N4 VLL3EG-1R, VLL3EG-2R, VLL4EG-1	No Changes	19	No
Group 4 with stack extensions <sup>2</sup>	VLL1EG-1-N1 through VLL1EG-1-N4	No Changes	4	No

#### **Table 1. Summary of Proposed Changes**

<sup>&</sup>lt;sup>1</sup> VLL2EG-N1 through VLL2EG-N4 have slightly different stack parameters than the other Group 1 Engines. Because potential emissions are unaffected by the altered stack dimensions, these engines will remain grouped with Group 1 Engines for permitting purposes.

<sup>&</sup>lt;sup>2</sup> VLL1EG-1-N1 through VLL1EG-1-N4 have slightly different stack parameters than the other Group 4 Engines. Filterable PM emissions are anticipated to be 5% higher in these engines. As such, potential emissions evaluate Group 4 engines with original parameters and Group 4 engines with stack extensions separately. Because the engines are the same make and model, these engines will remain grouped with Group 4 Engines for permitting purposes.

Generator Group	Currently Permitted Generators	Proposed Changes	Total Number of Generators in Group	SCRs?
Group 5	VLL5EG-1 through VLL5EG-12, VLL5EG-N1 through VLL5EG-N4 VLL5EG-1R, VLL5EG-2R, VLL6EG-1 through VLL6EG-12, VLL6EG-N1 through VLL6EG-N4 VLL6EG-1R, VLL6EG-2R VCN1EG-N1 through VCN1EG-N4, VCN2EG-N1 through VCN2EG-N4, VCN3EG-N1 through VCN3EG-N4, VCN5EG-N1 through VCN5EG-N4, VCN5EG-N1 through VCN5EG-N4,	No Changes	57	Yes
Group 6		<u>New:</u> VCN-EG-DCBX VCN-EG-DCBY	2	Yes
Temporary Generators	TMP-1, TMP-2	No Changes	2	No

# **3. FACILITY-WIDE EMISSIONS CALCULATIONS**

Pollutants emitted from the facility include NO<sub>x</sub>; CO; volatile organic compounds (VOC); sulfur dioxide (SO<sub>2</sub>); particulate matter (PM), including PM less than 10 microns in diameter (PM<sub>10</sub>) and PM less than 2.5 microns in diameter (PM<sub>2.5</sub>); hazardous air pollutants (HAP); and greenhouse gases (GHG), reported in the form of carbon dioxide equivalent (CO<sub>2</sub>e).

The methodology used to estimate the potential emissions from the regulated emissions sources at the site is discussed in the sections below. Detailed calculations are provided in **Appendix 3** and **Appendix 6**. All proposed emission sources will be fueled by ULSD and/or renewable diesel fuel conforming to EN15940 and ASTM D975 specification for petroleum (including HVO); the ISO8178 D2 test cycle emission rates are the same for both ULSD and HVO. Refer to **Appendix 5** for additional details. For simplicity and conservative purposes, the site will conservatively default to the ULSD load-specification emission factors.

#### 3.1 Diesel-Fired Emergency Standby Generators

Operation of the diesel-fired emergency generator engines will result in emissions of products of combustion.

#### 3.1.1 Derivation of Potential Hourly Emissions

The following emission factors were used to estimate the potential hourly emissions from the emergency generators:

- The manufacturer's engine-specific emission factors for NOx, VOC (hydrocarbons), CO, and filterable PM were used to estimate the emissions of those pollutants at each generator load. Not-to-exceed emission factors were used for Group 1 and Group 2. Not-to-exceed emission factors were not available for Group 3, Group 4, Group 5, or Group 6, so nominal emission rates were used with pollutant-specific safety factors applied. Because Group 3, Group 4, Group 5, and Group 6 generators did not have nominal emission data at 10% load, the emission factors at 10% load for these generators were conservatively assumed to be equal to the emission factors at 25% load. Four (4) Group 4 generators have stack extensions. Based on guidance from the manufacturer, a 5% increase was applied to the filterable PM emission factors for these engines.
- Diesel fuel emission factors in the USEPA's AP-42, Section 3.4, *Large Stationary Diesel and All Stationary Dual-fuel Engines* (October 1996) were used for emissions of condensable PM, SO<sub>2</sub>, and HAP.
- GHG emission factors and global warming potentials provided in 40 CFR 98 were used to estimate emissions of CO<sub>2</sub>e from diesel fuel combustion.

For the generators equipped with SCRs (i.e., **Group 5** and **Group 6** generators), in the rare instance the associated SCR units are not operational in an emergency, the applicant will use uncontrolled emission factors to calculate emissions. Uncontrolled **Group 5** engine emissions are the same as the **Group 4** engine emissions. Uncontrolled **Group 6** emission rates have been provided below. This is reflected in **Table 2**, which shows the NO<sub>X</sub> and CO emission rates that will be used for each engine group. The hourly emission rates for all groups of generators are consistent with those in Condition A601(H) of the facility's current permit. Note that for the generators equipped with SCR (i.e., **Group 5** and **Group 6** generators), the NO<sub>X</sub> emission rate was conservatively assumed to be equal to the emission rate at 100% load for all loads.

			NOx		Rate (CO /hr/eng	Emission R ine)	ate)
Engine Load (%)	Group 1	Group 2	Group 3	Group 4 & Group 5 without SCR	Group 5	Group 6 without SCR	Group 6
100%	81.01	71.88	16.78	64.56	6.46	63.65	6.37 (12.04)
Load	(12.63)	(9.06)	(4.31)	(3.99)	(3.99)	(12.04)	
75%	42.82	31.71	12.33	39.47	6.46	35.23	6.37 (7.59)
Load	(8.68)	(9.97)	(2.35)	(2.01)	(2.01)	(7.59)	
50%	24.31	17.22	11.04	20.61	6.46	20.37	6.37 (4.26)
Load	(8.10)	(5.74)	(1.18)	(2.24)	(2.24)	(4.26)	
25%	12.35	8.76	4.43	11.39	6.46	9.92	6.37 (3.25)
Load	(8.87)	(9.67)	(1.08)	(2.34)	(2.34)	(3.25)	
10%	11.57	12.38	4.43	4.25	6.46	3.97	6.37 (1.30)
Load	(6.94)	(11.54)	(1.08)	(0.87)	(0.87)	(1.30)	

#### Table 2. NOx and CO Emission Rates for Each Generator Group by Load

Consistent with Section A601(H) of the facility's construction permit, if an engine run occurs at a load other those listed, the facility will conservatively use the NO<sub>x</sub> or CO emission rate for the next highest load to estimate emissions from the run. For instance, if the maximum engine load during a run is 60%, the facility will use the emission rates for 75% load for that run, and an engine run at 0% load will use emission rates for 10% load for that run.

#### 3.1.2 Derivation of Potential Annual Emissions

Pursuant to Table 106.A of the facility's current construction permit, the applicant is subject to a federally enforceable site-wide NO<sub>X</sub> limitation of 99.9 tpy and a federally enforceable site-wide CO limitation of 99.9 tpy, each based on an aggregate, 12-month rolling basis to ensure that the facility remains a synthetic minor source with respect to the Title V and PSD permitting programs.

For all pollutants other than NO<sub>x</sub> and CO, the applicant has provided the ratio of pollutant emissions to NO<sub>x</sub> emissions (lb pollutant emitted/lb NO<sub>x</sub> emitted) for each pollutant at each load from each engine grouping. This methodology is summarized in **Table 3**, and additional detail is provided in **Appendix 3** and **Appendix 6**. With the proposed changes in this application, PTE from all generators is not increasing for any pollutant because the site-wide NO<sub>x</sub> limit, site-wide CO limit, and the maximum ratio of pollutant emission to NO<sub>x</sub> emissions are not changing.

Pollutant	Maximum Ratio of Pollutant Emissions to NO <sub>X</sub> Emissions (Ib pollutant emitted/Ib NO <sub>X</sub> emitted)	Total Potential Annual Emissions from All Generators <sup>a</sup> (tpy)
NOx		99.90
СО		99.90
VOC	0.22	21.93
Filterable PM	0.22	22.24
PM <sub>10</sub> /PM <sub>2.5</sub>	0.22	22.44
SO <sub>2</sub>	1.24x10 <sup>-3</sup>	0.12
Maximum Individual HAP (Benzene)	6.35x10 <sup>-4</sup>	0.06
Total HAP	1.29x10 <sup>-3</sup>	0.13
CO <sub>2</sub> e	133.88	13,375

#### **Table 3. Total Potential Annual Emissions from All Generators**

<sup>a</sup> Total Potential Annual Emissions from All Generators (tpy) = [99.9 tpy NO<sub>x</sub> Emissions] × [Max. Ratio of Pollutant Emissions to NO<sub>x</sub> Emissions (lb pollutant emitted/lb NO<sub>x</sub> emitted)].

#### 3.2 Diesel Belly Storage Tanks

Emissions of VOC from the diesel belly tanks will result from the standing and working losses.<sup>3</sup> These emissions were estimated using USEPA's TANKS 4.0.9.d program, which incorporates the equations from AP-42, Section 7.1, *Organic Liquid Storage Tanks* (November 2006). The maximum annual fuel throughput for each belly tank was based on:

- The maximum hourly diesel fuel consumption for each generator, per the manufacturer's specifications; and
- A maximum of 500 hours of operation per engine annually.

#### 3.3 Potential Emissions

A summary of the revised facility-wide potential emissions for the facility are provided in **Table 4**, which indicates that the facility will continue to be a synthetic minor source of air emissions after implementation of the proposed permit revisions.

<sup>&</sup>lt;sup>3</sup> Any potential HAP emissions from the operation of the diesel belly tanks are expected to be *de minimis*.

	Potential Annual Emissions (tpy)		Facility-Wide	Title V	
Pollutant	Emergency Generators	Diesel Belly Tanks	Potential Annual Emissions (tpy)	Major Source Threshold (tpy)	Above Threshold?
NOx	99.9		99.9	100	No
CO	99.9		99.9	100	No
VOC	21.9	0.44	22.3	100	No
PM (Filterable)	22.2		22.2	100	No
PM10/PM2.5	22.4		22.4	100	No
SO <sub>2</sub>	0.12		0.12	100	No
Maximum Individual HAP (Benzene)	0.06		0.06	10	No
Total HAP	0.13		0.13	25	No
CO <sub>2</sub> e	13,375		13,375	N/A	N/A

#### **Table 4. Facility-Wide Potential Emissions**

# 4. FEDERAL AND STATE REGULATORY APPLICABILITY

The following sections outline the federal and state air regulations that are potentially applicable to the proposed facility. Specifically, potentially applicable requirements under NSR, Title V, New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), and other state air quality rules in the NMAC are discussed herein.

#### 4.1 Major New Source Review

The NSR permitting program regulates emissions from major stationary sources of regulated air pollutants. NSR is comprised of two elements: Nonattainment NSR and PSD. Nonattainment NSR permitting is applicable in areas that have been designated as nonattainment for a regulated pollutant with respect to the National Ambient Air Quality Standards (NAAQS). PSD permitting applies in areas that have been designated as either attainment and/or unclassifiable. The facility is in Valencia County, which has been designated as attainment or unclassifiable for all criteria pollutants.<sup>4</sup> As such, PSD is the appropriate permitting program for the facility.

The PSD major source threshold for all regulated criteria pollutants is 250 tpy.<sup>5</sup> The applicant will continue to comply with the federally enforceable site-wide emission limits of 99.9 tpy NO<sub>X</sub> and 99.9 tpy CO, each on an aggregate, 12-month rolling basis. Compliance with these limits maintains site-wide potential emissions from all regulated pollutants to less than their respective major source thresholds. Thus, the facility will continue to be classified as a minor source with respect to the PSD permitting program.

#### 4.2 Title V Operating Permits

The Title V operating permits program, promulgated in 20.2.70 NMAC, requires a facility to obtain a Title V operating permit if it has potential emissions of a regulated criteria pollutant exceeding 100 tpy, of any single HAP exceeding 10 tpy, or of the aggregate of all HAP exceeding 25 tpy. As previously discussed, the applicant is subject to a site-wide NO<sub>X</sub> emission limitation of 99.9 tpy and a site-wide CO emission limitation of 99.9 tpy. As such, and as shown in **Table 4**, the site will continue to be classified as a Title V synthetic minor source.

#### 4.3 New Source Performance Standards

NSPS, promulgated in 40 CFR 60 and incorporated by reference under 20.2.77 NMAC, provide emissions standards for criteria pollutant emissions from new, modified, and reconstructed sources. The following sections discuss the NSPS that are potentially applicable to the proposed facility.

#### 4.3.1 40 CFR 60 Subpart A – General Provisions

NSPS Subpart A provides generally applicable requirements for testing, monitoring, notifications, and recordkeeping. Any source that is subject to another subpart under 40 CFR 60 is also subject to Subpart A, unless otherwise stated in the specific subpart.

- 4.3.2 <u>40 CFR 60 Subpart Kb Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 NSPS Subpart Kb applies to volatile organic liquid (VOL) storage vessels which were constructed, reconstructed, or modified after July 1984. VOL storage tanks are only subject to this rule if they meet one of the following criteria:<sup>6</sup></u>
  - The storage vessel has a maximum storage capacity greater than or equal to 151 m<sup>3</sup> (39,890 gallons) and which stores a VOL with a maximum true vapor pressure exceeding 3.5 kPa (0.51 psia); or,

<sup>4 40</sup> CFR 81.332

<sup>&</sup>lt;sup>5</sup> Data centers are not on the list of 28 source categories for which there is a lower major source threshold of 100 tpy for regulated criteria pollutants.

<sup>&</sup>lt;sup>6</sup> 40 CFR 60.110b(b)

The storage vessel has a maximum storage capacity greater than or equal to 75 m<sup>3</sup> -(19,812.9 gallons) but less than 151 m<sup>3</sup> and which stores a VOL with a maximum true vapor pressure exceeding 15.0 kPa (2.2 psia).

The diesel belly tanks for the generators each have a storage capacity less than 19,812.9 gallons. In addition, diesel fuel has a maximum true vapor pressure less than 2.2 psia. Therefore, NSPS Subpart Kb does not apply.

#### 4.3.3 <u>40 CFR 60 Subpart IIII – Stationary Compression Ignition Internal Combustion Engines</u>

NSPS Subpart IIII applies to new, modified, and reconstructed compression ignition (CI) internal combustion engines (ICE). New engines are subject to this regulation if construction of the CI ICE commenced after July 11, 2005, and if the engine was manufactured after April 1, 2006, for CI ICE that are not fire pump engines, or July 1, 2006, for CI ICE that are fire pump engines.<sup>7</sup> This rule is applicable to all CI ICE that are operated at the facility.

The emergency generator engines and fire pump at the site will meet the definition of emergency stationary ICE in 40 CFR 60.4219.

#### 4.3.3.1 Emission Standards for Emergency Generators

All generators at the site will be classified as emergency generators under this regulation and each will have a displacement of less than 10 liters per cylinder. Per 40 CFR 60.4205(b), each generator will be subject to the applicable emission standards in 40 CFR 1039, Appendix I. The Tier 2 emission standards for nonroad engines with a rated power greater than 560 kW are depicted in **Table 5**.<sup>8</sup> The USEPA Tier 2 standards for nonroad engines are based on a weighted cycle and cannot be used for comparison to the actual emissions from the engine at a specific load.

Pollutant	Emission Standard (g/kW-hr)
NO <sub>X</sub> + Non-Methane Hydrocarbons (NMHC)	6.4
СО	3.5
РМ	0.20

#### Table 5. Tier 2 Emission Standards

Additionally, the applicant is required to only combust in its generators fuel that complies with the following requirements in 40 CFR 1090.305 for nonroad diesel fuel:9

- Maximum sulfur content of 15 ppm; and
- Either a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent. \_

The applicant will comply with the emission standards in 40 CFR 1039, Appendix I by having purchased engines certified by the manufacturer to comply with the Tier 2 emission standards.<sup>10</sup> Further, the site will operate and maintain each engine according to the manufacturer's emissionrelated written instructions and only changes those emission-related settings that are permitted by the manufacturer.<sup>11</sup> The applicant will comply with the Tier 2 emission standards while firing either ULSD or renewable diesel, including HVO.

<sup>&</sup>lt;sup>7</sup> 40 CFR 60.4200(a)(2)

<sup>&</sup>lt;sup>8</sup> 40 CFR 1039, Appendix I, Table 2

<sup>&</sup>lt;sup>9</sup> 40 CFR 60.4207(b) <sup>10</sup> 40 CFR 60.4211(c)

<sup>&</sup>lt;sup>11</sup> 40 CFR 60.4211(a)

#### 4.3.3.2 Emission Standards for Fire Pump

The proposed fire pump will have a displacement of less than 30 liters per cylinder. Per 40 CFR 60.4205(c), the fire pump will be subject to the applicable emission standards in Table 4 of this subpart. The applicant will comply with the emission standards in 40 CFR 60 Subpart IIII by purchasing an engine certified by the manufacturer to comply with these emission standards.<sup>12</sup> Further, the site will operate and maintain the fire pump according to the manufacturer's emissionrelated written instructions and only change those emission-related settings that are permitted by the manufacturer.<sup>13</sup>

#### 4.3.3.3 Run Time Restrictions for Emergency ICE

For a stationary engine to be considered an emergency ICE under NSPS Subpart IIII, it must meet the run time restrictions in 40 CFR 60.4211(f).

There is no restriction on usage of an emergency ICE in emergency situations.<sup>14</sup> Each engine is restricted to a maximum of 100 hours per calendar year of operation for maintenance checks and readiness testing.<sup>15</sup> Each engine is allowed up to 50 hours per calendar year of non-emergency operation other than maintenance, testing; however, any non-emergency run time must be counted as part of the 100 hours per calendar year for maintenance and testing.<sup>16</sup>

All engines will be equipped with non-resettable hour meters that the facility will use during operations to verify compliance with the emergency and non-emergency total operating hour limitations.<sup>17</sup>

#### 4.3.3.4 Notifications, Reporting, and Recordkeeping

An initial notification under NSPS Subpart A is not required for emergency stationary ICE. The facility will retain records of the emergency and non-emergency runs for each engine, as recorded through the engine's non-resettable hour meter. The records will indicate the time of operation of the engine and the reason the engine was in operation during that time.<sup>18</sup>

#### 4.3.3.5 Modifications and the Use of an Alternative Fuel Source

The use of an alternative fuel source shall not be considered a modification, as defined by 40 CFR 60.14, if the facility is designed to accommodate that alternative use. The facility has installed engines that are designed to combust ULSD fuel and/or renewable diesel fuels conforming to ASTM D975 specifications including HVO (Appendix 5). Therefore, the use of renewable diesel fuels will not be considered a modification under the NSPS rules.<sup>19</sup> As shown in the manufacturer information in **Appendix 5**, the vendor has guaranteed ISO D2 8178 Weighted emission rates are the same or lower for all pollutants with HVO relative to N0. 2 ULSD.

#### 4.3.4 40 CFR 60 Subpart JJJJ – Stationary Spark Ignition Internal Combustion Engines

NSPS Subpart JJJJ is applicable to new, modified, and reconstructed stationary spark ignition (SI) ICE. All of the generators and fire pump at the site will be categorized as CI ICE. As such, NSPS Subpart JJJJ does not apply.

#### 4.4 **National Emission Standards for Hazardous Air Pollutants**

NESHAP, promulgated in 40 CFR 63 and incorporated by reference under 20.2.82 NMAC, regulate emissions of HAP from specific source categories. A facility that has potential emissions exceeding 10

<sup>&</sup>lt;sup>12</sup> 40 CFR 60.4211(c)

<sup>13 40</sup> CFR 60.4211(a)

<sup>&</sup>lt;sup>14</sup> 40 CFR 60.4211(f)(1)

<sup>&</sup>lt;sup>15</sup> 40 CFR 60.4211(f)(2)

<sup>&</sup>lt;sup>16</sup> 40 CFR 60.4211(f)(3) <sup>17</sup> 40 CFR 60.4209(a)

<sup>&</sup>lt;sup>18</sup> 40 CFR 60.4214(b)

<sup>&</sup>lt;sup>19</sup> 40 CFR 60.14(e)(4)

tpy for any individual HAP and/or potential emissions exceeding 25 tpy for the sum of all HAP is classified as a major source of HAP emissions. A facility that is not a major source of HAP is classified as an area source.

The facility is classified as an area source since it has potential HAP emissions less than the major source thresholds. The following sections discuss the NESHAP standards potentially applicable to the facility.

#### 4.4.1 40 CFR 63 Subpart A – General Provisions

NESHAP Subpart A provides generally applicable requirements for testing, monitoring, notifications, and recordkeeping. Any source that is subject to another subpart under 40 CFR 63 is also subject to Subpart A, unless otherwise stated in the specific subpart.

#### 4.4.2 <u>40 CFR 63 Subpart ZZZZ – Stationary Reciprocating Internal Combustion Engines</u>

NESHAP Subpart ZZZZ applies to new and existing stationary reciprocating internal combustion engines (RICE) located at both major and area sources of HAP emissions. Per 40 CFR 63.6590(c), for new or reconstructed stationary RICE located at an area source of HAP emissions, the only requirement under NESHAP Subpart ZZZZ is to meet the requirements of NSPS Subpart IIII for CI ICE or of NSPS Subpart JJJJ for SI ICE. Since the CI ICE at the facility will be in compliance with NSPS Subpart IIII, the units will also be in compliance with NESHAP Subpart ZZZZ. No further requirements apply for these engines under this regulation.

#### 4.5 New Mexico Administrative Code, Title 20, Chapter 2 – Air Quality

In addition to the federal regulations, 20.2 NMAC establishes regulations applicable at the emission unit level and at the facility level. The state regulations in Chapter 2 also include general requirements for facilities, such as the requirement to obtain construction and operating permits. Source-specific standards in 20.2 NMAC that are potentially applicable to operations at the site are discussed in the following sections.

#### 4.5.1 20.2.18 NMAC – Oil Burning Equipment – Particulate Matter

This regulation limits PM emissions and visible emissions from oil-burning equipment having a rated heat input capacity greater than 250 million British thermal units per hour (MMBtu/hr) per unit.<sup>20</sup> All generators at the facility will have a rated heat capacity less than 250 MMBtu/hr, individually. Therefore, this regulation does not apply.

#### 4.5.2 20.2.34 NMAC – Oil Burning Equipment – Nitrogen Dioxide

This regulation limits nitrogen dioxide (NO<sub>2</sub>) emissions from oil burning equipment having a heat input of greater than 1,000,000 million British thermal units per year (MMBtu/yr) per unit to less than or equal to 0.3 lb/MMBtu of heat input.<sup>21</sup> Since each emergency generator will operate a maximum of 500 hours annually, the potential annual heat input capacity per engine is less than 1,000,000 MMBtu/yr. Therefore, this regulation does not apply.

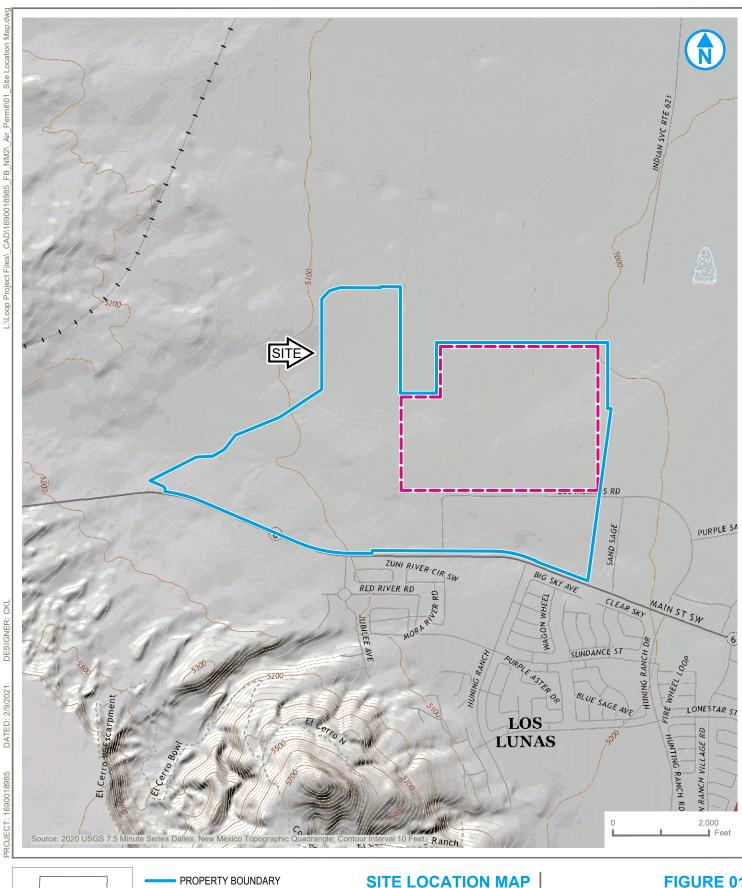
#### 4.5.3 20.2.61 NMAC – Smoke and Visible Emissions

20.2.61.109 NMAC limits visible emissions from stationary combustion equipment to no more than 20% opacity. Compliance with the limitation for visible emissions is achieved through the exclusive use of ULSD and/or renewable diesel fuel in the emergency generators, which will result in negligible opacity from the sources.

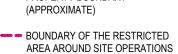
<sup>&</sup>lt;sup>20</sup> 20.2.18.109 NMAC

<sup>&</sup>lt;sup>21</sup> 20.2.34.108 NMAC

# Appendix 1 Site Location and Layout







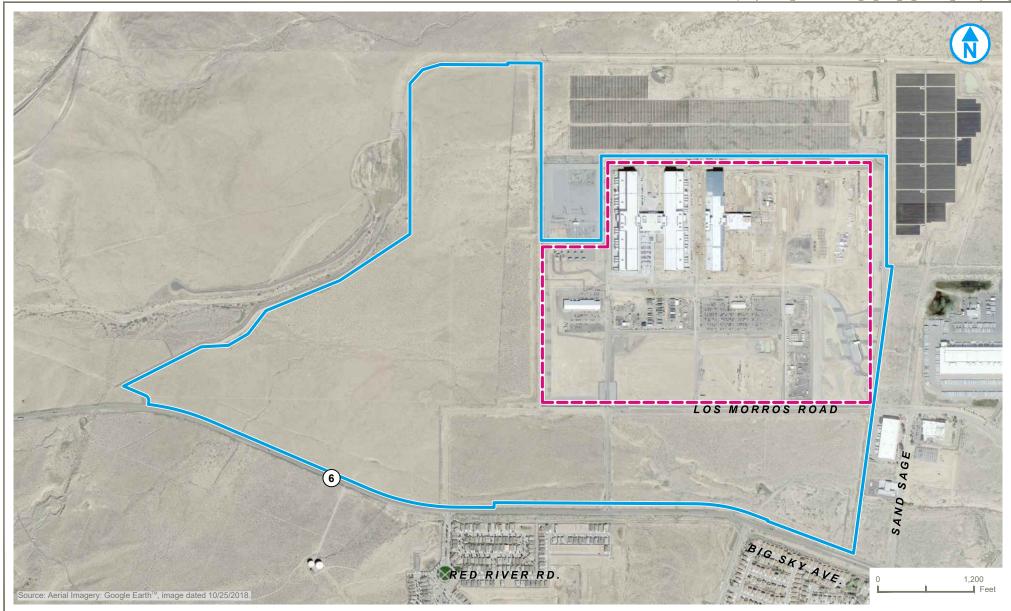
# SITE LOCATION MAP

## **FIGURE 01**

RAMBOLL AMERICAS ENGINEERING SOLUTIONS, INC. A RAMBOLL COMPANY



Map Scale: 1:24,000 Map Center: 34°49'38.2434", -106°47'23.3313" **GREATER KUDU LLC** LOS LUNAS, NEW MEXICO



### SITE LAYOUT

#### **FIGURE 02**

RAMBOLL AMERICAS ENGINEERING SOLUTIONS, INC. A RAMBOLL COMPANY



PROPERTY BOUNDARY (APPROXIMATE)

**GREATER KUDU LLC** LOS LUNAS, NEW MEXICO

# Appendix 2 NMED Application Forms

PURSUANT TO A CLAIM OF CONFIDENTIALITY, INFORMATION IN THIS APPENDIX HAS BEEN REDACTED BY THE APPLICANT BY BLACKING IT OUT.

#### **Mail Application To:**

New Mexico Environment Department Air Quality Bureau Permits Section 525 Camino de los Marquez, Suite 1 Santa Fe, New Mexico, 87505

Phone: (505) 476-4300 Fax: (505) 476-4375 www.env.nm.gov/aqb



# **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.

 This application is 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:
 NOI 20.2.73 NMAC
 20.2.72 NMAC application or 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. 🔲 Title V Operating, Title IV Acid Rain, and NPR applications have no fees.

S \$500 NSR application Filing Fee enclosed OR □ The full permit fee associated with 10 fee points (required w/ streamline applications).

Check No.: \_\_\_\_ in the amount of \_\_\_\_\_

I acknowledge the required submittal format for the hard copy application is printed double sided 'head-to-toe', 2-hole punched (except the Sect. 2 landscape tables is printed 'head-to-head'), numbered tab separators. Incl. a copy of the check on a separate page.

I acknowledge there is an annual fee for permits in addition to the permit review fee: <u>www.env.nm.gov/air-quality/permit-fees-</u> <u>2/.</u>

This facility qualifies for the small business fee reduction per 20.2.75.11.C. NMAC. The full \$500.00 filing fee is included with this application and I understand the fee reduction will be calculated in the balance due invoice. The Small Business Certification Form has been previously submitted or is included with this application. (Small Business Environmental Assistance Program Information: <a href="http://www.env.nm.gov/air-quality/small-biz-eap-2/">www.env.nm.gov/air-quality/small-biz-eap-2/</a>.)

**Citation:** Please provide the **low level citation** under which this application is being submitted: **20.2.72.219.D NMAC** (e.g. application for a new minor source would be 20.2.72.200.A NMAC, one example for a Technical Permit Revision is 20.2.72.219.B.1.b NMAC, a Title V acid rain application would be: 20.2.70.200.C NMAC)

## Section 1 – Facility Information

Sec	tion 1-A: Company Information	<mark>AI #</mark> if known: <b>37303</b>	Updating Permit/NOI #: <b>7026-M5</b>		
1	Facility Name: Greater Kudu LLC	Plant primary SIC Code (4 digits): 7374			
T		Plant NAIC code (6 digits): 518210			
а	<ul> <li>Facility Street Address (If no facility street address, provide directions from a prominent landmark):</li> <li>4250 Messenger Loop NW, Los Lunas, NM 87031</li> </ul>				
2	Plant Operator Company Name: Greater Kudu LLC	Phone/Fax: (915) 526-4191			
а	Plant Operator Address: 4250 Messenger Loop NW, Los Lunas, NM 87031	L			

b	Plant Operator's New Mexico Corporate ID or Tax ID: 32-0490391			
3	Plant Owner(s) name(s): Kathy Rushmore Phone/Fax: (650) 308-7461			
а	Plant Owner(s) Mailing Address(s): 1 Hacker Way, Menlo Park, CA 94025			
4	Bill To (Company): Ramboll Americas Engineering Solutions, Inc.	Phone/Fax: (703) 516-2300		
а	Mailing Address: 4245 North Fairfax Drive, Suite 700, Arlington, VA 22203	E-mail: eotterburg@ramboll.com		
5	Preparer: Eri Ottersburg, Ramboll Consultant: Eri Ottersburg, Ramboll	Phone/Fax: (206) 336-1677		
а	Mailing Address: 901 5th Ave, Suite 3900, Seattle, WA 98164	E-mail: eottersburg@ramboll.com		
6	Plant Operator Contact: Kevin Strickland	Phone/Fax: (915) 526-4191		
а	Address: 4250 Messenger Loop NW, Los Lunas, NM 87031	E-mail: s1046177@meta.com		
7	Air Permit Contact: Eri Ottersburg	Title: Managing Consultant, Ramboll		
а	E-mail: eottersburg@ramboll.com Phone/Fax: (206) 336-1677			
b	Mailing Address: 901 5th Ave, Suite 3900, Seattle, WA 98164			
с	The designated Air permit Contact will receive all official correspondence (i.e. letters, permits) from the Air Quality Bureau.			

# Section 1-B: Current Facility Status

1.a	Has this facility already been constructed? IXI Yes I I NO		1.b If yes to question 1.a, is it currently operating in New Mexico?		
2	Intent (NOI) (20.2.73 NMAC) before submittal of this application?		If yes to question 1.a, was the existing facility subject to a construction permit (20.2.72 NMAC) before submittal of this application?  Ves  Ves  No		
3	Is the facility currently shut down? 🔲 Yes 🛛 No	If yes, give m	onth and year of shut down (MM/YY):		
4	Was this facility constructed before 8/31/1972 and continuously operated since 1972?   Yes  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?				
6	Does this facility have a Title V operating permit (20.2.70 NMAC)?		If yes, the permit No. is: P-		
7	Has this facility been issued a No Permit Required (NPR)?		If yes, the NPR No. is:		
8	Has this facility been issued a Notice of Intent (NOI)?		If yes, the NOI No. is:		
9	Does this facility have a construction permit (20.2.72/20.2.74 NMAC)? ⊠ Yes □ No		? If yes, the permit No. is: <b>7026-M5</b>		
10	Is this facility registered under a General permit (GCP-1, GCP-2, etc.)? ☐ Yes ⊠ 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)				
а	Current	Hourly: N/A	Daily: N/A	Annually: 500 hrs operations/yr (maximum per generator)	
b	Proposed	Hourly: N/A	Daily: N/A	Annually: 500 hrs operations/yr (maximum per generator)	
2	What is the facility's maximum production rate, specify units (reference here and list capacities in Section 20, if more room is required)				
а	Current	Hourly: N/A	Daily: N/A	Annually: 500 hrs operations/yr (maximum per generator)	
b	Proposed	Hourly: N/A	Daily: N/A	Annually: 500 hrs operations/yr (maximum per generator)	

# Section 1-D: Facility Location Information

1	Latitude (decimal degrees): 34°49'43"	Longitude	(decimal degrees): 106°46'53'	n	County: Valencia	Elevation (ft): <b>5,030</b>				
2	UTM Zone: 🔲 12 or 🔀 13		Datum: 🖾 NAD 83 🛛 WGS 84							
а	UTM E (in meters, to nearest 10 meters): 337,09	8	UTM N (in meters, to nearest 10 r	meters)	: 3,855,484					
3	Name and zip code of nearest New Mexico	o town: Los	Lunas, 87031							
4	Detailed Driving Instructions from nearest NM town (attach a road map if necessary): From U.S. Highway 25, head west on Main Street SW for approximately 0.5 miles and turn right onto Los Morros Road. The property is 0.3 miles northwest of the intersection of Los Morros Road and Sandsage Court.									
5	The facility is within the Village of Los Lur	nas municip	ality.							
6	Land Status of facility (check one): 🔀 Priv	vate 🔲 Ind	ian/Pueblo 🔲 Government	🗌 BI	-M 🔲 Forest Se	rvice 🔲 Military				
7	List all municipalities, Indian tribes, and co which the facility is proposed to be constr Valencia County, Bernalillo County, Albuc	ucted or ope	erated:		-					
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/air-quality/modeling- publications/ http://www.nmenv.state.nm.us/aqb/modeling/class1areas.html)?									
9	Name nearest Class I area: Bosque del Ap	ache Nation	al Wildlife Refuge							
10	Shortest distance (in km) from facility bou	indary to the	boundary of the nearest Clas	s I are	a (to the nearest 10 r	neters): <b>117.10 km</b>				
11	Distance (meters) from the perimeter of t lands, including mining overburden remov									
12	Method(s) used to delineate the Restricted Area: TBD "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? Yes 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 wit If yes, what is the name and permit numb			prope	rty? 🔀 No	Yes				

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

1	Facility <b>maximum</b> operating ( $\frac{hours}{day}$ ): 24	( <mark>days</mark> (week): 7	(weeks year): 52	(hours year): 500 (per u	unit)			
2	Facility's maximum daily operating schedule (if less	than 24 hours day )? Start: N/A	□AM □PM	End: N/A	PAM PM			
3	Month and year of anticipated start of construction: July 2024							
4	Month and year of anticipated construction completion: 2025+							
5	Month and year of anticipated startup of new or modified facility: 2025+							
6	Will this facility operate at this site for more than o	ne year? 🛛 Yes 🗌 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? Yes No If yes, specify:								
а	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? Yes No If Yes, provide the 1c & 1d info below:								
с	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 or modeling waiver being submitted with this application?								
3	Does this facility require an "Air Toxics" permit under 20.2.72.400 NMAC & 20.2.72.502, Tables A and/or B? 🔲 Yes 🔀 No								
4	Will this facility be a source of federal Hazardous Air Pollu	tants (HAP)? 🔀 Yes	No						
а	If Yes, what type of source? $\square$ Major ( $\square \ge 10$ tpy of a OR $\square$ Minor ( $\square < 10$ tpy of any		$ \ge 25$ tpy of any combination of HAPS) < 25 tpy of any combination of HAPS)						
5	Is any unit exempt under 20.2.72.202.B.3 NMAC? X Yes 🗆 No								
a	If yes, include the name of company providing commercia Commercial power is purchased from a commercial utility								
1	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	I have filled out Section 18, "Addendum for Stream	line Applications." X/A (This is not a Streamline application.)
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#### Section 1-H: Current Title V Information - Required for all applications from TV Sources

(Title V-source required information for all applications submitted pursuant to 20.2.72 NMAC (Minor Construction Permits), or 20.2.74/20.2.79 NMAC (Major PSD/NNSR applications), and/or 20.2.70 NMAC (Title V))

1	Responsible Official (R.O.) (20.2.70.300.D.2 NMAC):		Phone:					
а	R.O. Title:	R.O. e-mail:						
b	R. O. Address:							
2	Alternate Responsible Official (20.2.70.300.D.2 NMAC):		Phone:					
а	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 have operating (20.2.70 NMAC) permits and with whom the applic relationship):	· · ·						
4	Name of Parent Company ("Parent Company" means the primary permitted wholly or in part.):	name of the organiz	ation that owns the company to be					
а	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 conta	cts familiar with pla	nt 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:

- One hard copy original signed and notarized application package printed double sided 'head-to-toe' <u>2-hole punched</u> as we bind the document on top, not on the side; except Section 2 (landscape tables), which should be head-to-head. 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. Please include a copy of the check on a separate page.
- 2) If the application is for a minor NSR, PSD, NNSR, or Title V application, include one working hard **copy** for Department use. This copy should be printed in book form, 3-hole punched, and **must be double sided**. Note that this is in addition to the head-to-to 2-hole punched copy required in 1) above. Minor NSR Technical Permit revisions (20.2.72.219.B NMAC) only need to fill out Sections 1-A, 1-B, 3, and should fill out those portions of other Section(s) relevant to the technical permit revision. TV Minor Modifications need only fill out Sections 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. Electronic files for applications for NOIs, any type of General Construction Permit (GCP), or technical revisions to NSRs must be submitted with compact disk (CD) or digital versatile disc (DVD). For these 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. Electronic files for other New Source Review (construction) permits/permit modifications or Title V permits/permit modifications can be submitted on CD/DVD or sent through AQB's secure file transfer service.

#### Electronic files sent by (check one):

CD/DVD attached to paper application

Secure electronic transfer. Air Permit Contact Name\_\_\_\_\_, Email\_\_\_\_\_, Phone number \_\_\_\_\_.

a. If the file transfer service is chosen by the applicant, after receipt of the application, the Bureau will email the applicant with instructions for submitting the electronic files through a secure file transfer service. Submission of the electronic files through the file transfer service needs to be completed within 3 business days after the invitation is received, so the applicant should ensure that the files are ready when sending the hard copy of the application. The applicant will not need a password to complete the transfer. **Do not use the file transfer service for NOIs, any type of GCP, or technical revisions to NSR permits.** 

- 4) Optionally, the applicant may submit the files with the application on compact disk (CD) or digital versatile disc (DVD) following the instructions above and the instructions in 5 for applications subject to PSD review.
- 5) If air dispersion modeling is required by the application type, include the NMED Modeling Waiver and/or electronic air dispersion modeling report, input, and output files. The dispersion modeling <u>summary report only</u> should be submitted as hard copy(ies) unless otherwise indicated by the Bureau.
- 6) If the applicant submits the electronic files on CD and the application is subject to PSD review under 20.2.74 NMAC (PSD) or NNSR under 20.2.79 NMC include,
  - a. one additional CD copy for US EPA,
  - b. one additional CD copy for each federal land manager affected (NPS, USFS, FWS, USDI) and,
  - c. one additional CD copy for each affected regulatory agency other than the Air Quality Bureau.

If the application is submitted electronically through the secure file transfer service, these extra CDs do not need to be submitted.

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

- 1) All required electronic documents shall be submitted as 2 separate CDs or submitted through the AQB secure file transfer service. Submit 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 and formulas 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. 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 4 electronic files (3 MSWord docs: Universal Application section 1 [UA1], Universal Application section 3-19 [UA3], and Universal Application 4, the modeling report [UA4]) and 1 Excel file of the tables (Universal Application section 2 [UA2]). 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 number (0 for original, 1, 2, etc.; which will help keep track of subsequent partial update(s) to the original submittal. Do not use special symbols (#, @, etc.) in file names. The footer information should not be modified by the applicant.

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Section 8:	Map(s)
Section 9:	Proof of Public Notice
Section 10:	Written Description of the Routine Operations of the Facility
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Section 17:	Compliance Test History
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Section 20:	Other Relevant Information
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#### Section 22: Certification Page

#### Table 2-A: Regulated Emission Sources

Unit and stack numbering must correspond throughout the application package. If applying for a NOI under 20.2.73 NMAC, equipment exemptions under 2.72.202 NMAC do not apply.

					Manufact- urer's Rated	Requested Permitted	Date of Manufacture <sup>2</sup>	Controlled by Unit #	Source Classi-			RICE Ignition Type	
Unit Number <sup>1</sup>	Source Description	Make	Model #	Serial #	Capacity <sup>3</sup> (Specify Units)	Capacity <sup>3</sup> (Specify Units)	Date of Construction/ Reconstruction <sup>2</sup>	Emissions vented to Stack #	fication Code (SCC)	For Each Piece of Equ	uipment, Check One	(CI. SI. 4SLB. 4SRB.	Replacing Unit No.
	N/A - All "regulated	emission sour	•	fy for equipn r to Table 2-	•	tions under	20.72.202 NMAC		38500110	Existing (unchanged) New/Additional To Be Modified	To be Removed Replacement Unit To be Replaced	N/A	N/A
										Existing (unchanged) New/Additional To Be Modified	To be Removed Replacement Unit To be Replaced		

<sup>1</sup> Unit numbers must correspond to unit numbers in the previous permit unless a complete cross reference table of all units in both permits is provided.

<sup>2</sup> Specify dates required to determine regulatory applicability.

<sup>3</sup> To properly account for power conversion efficiencies, generator set rated capacity shall be reported as the rated capacity of the engine in horsepower, not the kilowatt capacity of the generator set.

<sup>4</sup> "4SLB" means four stroke lean burn engine, "4SRB" means four stroke rich burn engine, "2SLB" means two stroke lean burn engine, "CI" means compression ignition, and "SI" means spark ignition

#### Table 2-B: Insignificant Activities<sup>1</sup> (20.2.70 NMAC) OR Exempted Equipment (20.2.72 NMAC)

All 20.2.70 NMAC (Title V) applications must list all Insignificant Activities in this table. All 20.2.72 NMAC applications must list Exempted Equipment in this table. If equipment listed on this table is exempt under 20.2.72.202.B.5, include emissions calculations and emissions totals for 202.B.5 "similar functions" units, operations, and activities in Section 6, Calculations. Equipment and activities exempted under 20.2.72.202 NMAC may not necessarily be Insignificant under 20.2.70 NMAC (and vice versa). Unit & stack numbering must be consistent throughout the application package. Per Exemptions Policy 02-012.00 (see http://www.env.nm.gov/aqb/permit/aqb\_pol.html), 20.2.72.202.B NMAC Exemptions do not apply, but 20.2.72.202.A NMAC exemptions do apply to NOI facilities under 20.2.73 NMAC. List 20.2.72.301.D.4 NMAC Auxiliary Equipment for Streamline applications in Table 2-A. The List of Insignificant Activities (for TV) can be found online at https://www.env.nm.gov/wpcontent/uploads/sites/2/2017/10/InsignificantList/TitleV.pdf. TV sources may elect to enter both TV Insignificant Activities and Part 72 Exemptions on this form.

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction <sup>2</sup>	For Each Piece of Equipment, Check Onc			
e int i tunio e	Source Description	ei	Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction <sup>2</sup>	i of zaca i rece of zquipalency eneer one			
VLL1EG-1	Diesel-Fired Emergency				20.2.72.202.B.3	2017	X Existing (unchanged) To be Removed New/Additional Replacement Unit			
VLLIEG-I	Generator			bkW	NA	2018	To Be Modified To be Replaced			
VLL1EG-2	Diesel-Fired Emergency				20.2.72.202.B.3	2017	X Existing (unchanged) To be Removed New/Additional Replacement Unit			
VELIEG-2	Generator			bkW	NA	2018	To Be Modified To be Replaced			
VLL1EG-3	Diesel-Fired Emergency				20.2.72.202.B.3	2017	X Existing (unchanged) To be Removed New/Additional Replacement Unit			
VLLIEG-5	Generator			bkW	NA	2018	To Be Modified To be Replaced			
VLL1EG-4	Diesel-Fired Emergency				20.2.72.202.B.3	2017	X Existing (unchanged) To be Removed New/Additional Replacement Unit			
VLLIEG-4	Generator			bkW	NA	2018	To Be Modified To be Replaced			
VLL1EG-5	Diesel-Fired Emergency				20.2.72.202.B.3	2017	X Existing (unchanged) To be Removed New/Additional Replacement Unit			
VLLIEG-5	Generator			bkW	NA	2018	To Be Modified To be Replaced			
VLL1EG-6	Diesel-Fired Emergency				20.2.72.202.B.3	2017	X Existing (unchanged) To be Removed New/Additional Replacement Unit			
VLLIEG-0	Generator			bkW	NA	2018	To Be Modified To be Replaced			
VLL1EG-7	Diesel-Fired Emergency				20.2.72.202.B.3	2017	X Existing (unchanged) To be Removed New/Additional Replacement Unit			
VLLIEG-/	Generator			bkW	NA	2018	To Be Modified To be Replaced			
VLL1EG-8	Diesel-Fired Emergency				20.2.72.202.B.3	2017	X Existing (unchanged) To be Removed New/Additional Replacement Unit			
VLLIEG-0	Generator			bkW	NA	2018	To Be Modified To be Replaced			
VLL1EG-9	Diesel-Fired Emergency				20.2.72.202.B.3	2017	X Existing (unchanged) To be Removed New/Additional Replacement Unit			
VLLIEG-9	Generator			bkW	NA	2018	To Be Modified To be Replaced			
VLL1EG-10	Diesel-Fired Emergency				20.2.72.202.B.3	2017	X Existing (unchanged) To be Removed New/Additional Replacement Unit			
VLLIEG-10	Generator			bkW	NA	2018	To Be Modified To be Replaced			
VLL1EG-11	Diesel-Fired Emergency				20.2.72.202.B.3	2017	X Existing (unchanged) To be Removed New/Additional Replacement Unit			
VLLIEG-II	Generator			bkW	NA	2018	To Be Modified To be Replaced			
VLL1EG-12	Diesel-Fired Emergency				20.2.72.202.B.3	2017	X Existing (unchanged) To be Removed New/Additional Replacement Unit			
VLLIEG-12	Generator			bkW	NA	2018	New/Additional Replacement Unit To Be Modified To be Replaced			
VLL1EG-1R	Diesel-Fired Emergency				20.2.72.202.B.3	2017	X Existing (unchanged) To be Removed New/Additional Replacement Unit			
VLLIEG-IK	Generator			bkW	NA	2018	New/Additional Replacement Unit To Be Modified To be Replaced			
						-				

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Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction <sup>2</sup>	For Each Piece of Equipment, Check Onc
Unit Pulliber	Source Description	Manufacturer	Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction <sup>2</sup>	For Each Field of Equipment, Check One
VLL1EG-2R	Diesel-Fired Emergency				20.2.72.202.B.3	2017	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLLIEG-2K	Generator			bkW	NA	2018	To Be Modified To be Replaced
VLL2EG-1	Diesel-Fired Emergency				20.2.72.202.B.3	2018	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLL2EG-1	Generator			bkW	NA	2018	To Be Modified To be Replaced
VLL2EG-2	Diesel-Fired Emergency				20.2.72.202.B.3	2018	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLL2EG-2	Generator			bkW	NA	2018	New/Additional Replacement Unit To Be Modified To be Replaced
VLL2EG-3	Diesel-Fired Emergency				20.2.72.202.B.3	2018	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLL2EG-3	Generator			bkW	NA	2018	To Be Modified To be Replaced
VLL2EG-4	Diesel-Fired Emergency				20.2.72.202.B.3	2018	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLL2EG-4	Generator			bkW	NA	2018	To Be Modified To be Replaced
VLL2EG-5	Diesel-Fired Emergency				20.2.72.202.B.3	2018	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLL2EG-5	Generator			bkW	NA	2018	To Be Modified To be Replaced
VLL2EG-6	Diesel-Fired Emergency				20.2.72.202.B.3	2018	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLL2EG-0	Generator			bkW	NA	2018	To Be Modified To be Replaced
VLL2EG-7	Diesel-Fired Emergency				20.2.72.202.B.3	2018	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLL2EG-7	Generator			bkW	NA	2019	New/Additional         Replacement Unit           To Be Modified         To be Replaced
VLL2EG-8	Diesel-Fired Emergency				20.2.72.202.B.3	2018	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLL2EG-0	Generator			bkW	NA	2019	To Be Modified To be Replaced
VLL2EG-9	Diesel-Fired Emergency				20.2.72.202.B.3	2018	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLL2EG-9	Generator			bkW	NA	2019	To Be Modified To be Replaced
VLL2EG-10	Diesel-Fired Emergency				20.2.72.202.B.3	2018	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLL2EG-10	Generator			bkW	NA	2019	New/Additional         Replacement Unit           To Be Modified         To be Replaced
VLL2EG-11	Diesel-Fired Emergency				20.2.72.202.B.3	2018	X Existing (unchanged) To be Removed
VLL2EG-11	Generator			bkW	NA	2019	New/Additional         Replacement Unit           To Be Modified         To be Replaced
VLL2EG-12	Diesel-Fired Emergency				20.2.72.202.B.3	2018	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLL2EG-12	Generator			bkW	NA	2019	New/Additional Replacement Unit To Be Modified To be Replaced
VLL2EG-1R	Diesel-Fired Emergency				20.2.72.202.B.3	2018	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLL2EG-IK	Generator			bkW	NA	2019	To Be Modified To be Replaced
VILLANC AD	Diesel-Fired Emergency				20.2.72.202.B.3	2018	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLL2EG-2R	Generator			bkW	NA	2019	New/Additional Replacement Unit To Be Modified To be Replaced

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Unit Number	Source Description	Manufacturer	Model No. Serial No.	Max Capacity Capacity Units	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5) Insignificant Activity citation (e.g. IA List	Date of Manufacture /Reconstruction <sup>2</sup> Date of Installation	For Each Piece of Equipment, Check Onc
					Item #1.a)	/Construction <sup>2</sup>	
VLL3EG-1	Diesel-Fired Emergency				20.2.72.202.B.3	2019	X Existing (unchanged) To be Removed New/Additional Replacement Unit
	Generator			bhp	NA	2019	To Be Modified To be Replaced
VLL3EG-2	Diesel-Fired Emergency				20.2.72.202.B.3	2019	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLL3EG-2	Generator			bhp	NA	2019	To Be Modified To be Replaced
VLL3EG-3	Diesel-Fired Emergency				20.2.72.202.B.3	2019	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VELSEG-5	Generator			bhp	NA	2019	To Be Modified To be Replaced
VLL3EG-4	Diesel-Fired Emergency				20.2.72.202.B.3	2019	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLLJEG-4	Generator			bhp	NA	2019	To Be Modified To be Replaced
VLL3EG-5	Diesel-Fired Emergency				20.2.72.202.B.3	2019	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLLSEG-5	Generator			bhp	NA	2019	To Be Modified To be Replaced
VLL3EG-6	Diesel-Fired Emergency				20.2.72.202.B.3	2019	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLLSEG-0	Generator			bhp	NA	2019	To Be Modified To be Replaced
VLL3EG-7	Diesel-Fired Emergency				20.2.72.202.B.3	2019	X Existing (unchanged) To be Removed New/Additional Replacement Unit
vLL3EG-7	Generator			bhp	NA	2020	To Be Modified To be Replaced
VLL3EG-8	Diesel-Fired Emergency				20.2.72.202.B.3	2019	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLLSEG-8	Generator			bhp	NA	2020	To Be Modified To be Replaced
VLL3EG-9	Diesel-Fired Emergency				20.2.72.202.B.3	2019	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLL3EG-9	Generator			bhp	NA	2020	To Be Modified To be Replaced
VLL3EG-10	Diesel-Fired Emergency				20.2.72.202.B.3	2019	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLL3EG-10	Generator			bhp	NA	2020	To Be Modified To be Replaced
VLL3EG-11	Diesel-Fired Emergency				20.2.72.202.B.3	2019	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLL3EG-11	Generator			bhp	NA	2020	To Be Modified To be Replaced
VLL3EG-12	Diesel-Fired Emergency				20.2.72.202.B.3	2019	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLLJEG-12	Generator			bhp	NA	2020	To Be Modified To be Replaced
VLL3EG-1R	Diesel-Fired Emergency				20.2.72.202.B.3	2019	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLLJEG-IK	Generator			bhp	NA	2019	To Be Modified To be Replaced
VLL3EG-2R	Diesel-Fired Emergency				20.2.72.202.B.3	2019	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLLJEG-2K	Generator			bhp	NA	2020	To Be Modified To be Replaced
VLL4EG-1	Diesel-Fired Emergency				20.2.72.202.B.3	2019	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VLL4EG-1	Generator			bhp	NA	2020	To Be Modified To be Replaced

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction <sup>2</sup>	For Each Piece of Equipment, Check Onc		
			Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	citation (e.g. IA List Date of Installation /Construction <sup>2</sup>			
VLL5EG-1	Diesel-Fired Emergency				20.2.72.202.B.3	2020	X Existing (unchanged) To be Removed New/Additional Replacement Unit		
VELSEG-1	Generator			bhp	NA	2021	To Be Modified To be Replaced		
VLL5EG-2	Diesel-Fired Emergency				20.2.72.202.B.3	2020	X Existing (unchanged) To be Removed New/Additional Replacement Unit		
VELSEG-2	Generator			bhp	NA	2021	To Be Modified To be Replaced		
	Diesel-Fired Emergency				20.2.72.202.B.3	2020	X Existing (unchanged) To be Removed		
VLL5EG-3	Generator			bhp	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced		
VLL5EG-4	Diesel-Fired Emergency				20.2.72.202.B.3	2020	X Existing (unchanged) To be Removed New/Additional Replacement Unit		
VLL3EG-4	Generator			bhp	NA	2021	To Be Modified To be Replaced		
VLL5EG-5	Diesel-Fired Emergency				20.2.72.202.B.3	2020	X Existing (unchanged) To be Removed New/Additional Replacement Unit		
VLLJEG-J	Generator			bhp	NA	2021	To Be Modified To be Replaced		
VLL5EG-6	Diesel-Fired Emergency				20.2.72.202.B.3	2020	X Existing (unchanged) To be Removed New/Additional Replacement Unit		
VLLJEG-0	Generator			bhp	NA	2021	To Be Modified To be Replaced		
VLL5EG-7	Diesel-Fired Emergency				20.2.72.202.B.3	2020	X Existing (unchanged) To be Removed New/Additional Replacement Unit		
VLLSEG-/	Generator			bhp	NA	2021	To Be Modified To be Replaced		
VLL5EG-8	Diesel-Fired Emergency				20.2.72.202.B.3	2020	X Existing (unchanged) To be Removed New/Additional Replacement Unit		
VLLSEG-8	Generator			bhp	NA	2021	To Be Modified To be Replaced		
VLL5EG-9	Diesel-Fired Emergency				20.2.72.202.B.3	2020	X Existing (unchanged) To be Removed New/Additional Replacement Unit		
VLLJEG-9	Generator			bhp	NA	2021	New/Additional         Replacement Unit           To Be Modified         To be Replaced		
VLL5EG-10	Diesel-Fired Emergency				20.2.72.202.B.3	2020	X Existing (unchanged) To be Removed New/Additional Replacement Unit		
VLLSEG-10	Generator			bhp	NA	2021	To Be Modified To be Replaced		
VLL5EG-11	Diesel-Fired Emergency				20.2.72.202.B.3	2020	X Existing (unchanged) To be Removed New/Additional Replacement Unit		
VLL5EG-II	Generator			bhp	NA	2021	To Be Modified To be Replaced		
VLL5EG-12	Diesel-Fired Emergency				20.2.72.202.B.3	2020	X Existing (unchanged) To be Removed New/Additional Replacement Unit		
VLLJEG-12	Generator			bhp	NA	2021	To Be Modified To be Replaced		
VLL5EG-1R	Diesel-Fired Emergency				20.2.72.202.B.3	2020	X Existing (unchanged) To be Removed New/Additional Replacement Unit		
VLLJEU-IK	Generator			bhp	NA	2021	To Be Modified To be Replaced		
VLL5EG-2R	Diesel-Fired Emergency				20.2.72.202.B.3	2020	X Existing (unchanged) To be Removed New/Additional Replacement Unit		
vELJEG-2K	Generator			bhp	NA	2021	To Be Modified To be Replaced		
VLL6EG-1	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged) To be Removed New/Additional Replacement Unit		
VLLUEU-I	Generator			bhp	NA	2021	To Be Modified To be Replaced		
VLL6EG-2	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged) To be Removed New/Additional Replacement Unit		
* LLUEU-2	Generator			bhp	NA	2021	To Be Modified To be Replaced		
VLL6EG-3	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged) To be Removed New/Additional Replacement Unit		
, 11010-5	Generator			bhp	NA	2021	To Be Modified To be Replaced		

Unit Number	Source Description	Model No. Max Capacity (e.g. 20.2.72.202.B.5)		List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction <sup>2</sup>	- For Each Piece of Equipment, Check Onc	
	Source Description		Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction <sup>2</sup>	a
	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged) To be Removed
VLL6EG-4	Generator			bhp	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced
	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged) To be Removed
VLL6EG-5	Generator			bhp	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced
	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged) To be Removed
VLL6EG-6	Generator			bhp	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced
	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged) To be Removed
VLL6EG-7	Generator			bhp	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced
	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged) To be Removed
VLL6EG-8	Generator			bhp	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced
	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged) To be Removed
VLL6EG-9	Generator			bhp	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced
	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged) To be Removed
VLL6EG-10	Generator			bhp	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced
	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged) To be Removed
VLL6EG-11	Generator			bhp	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced
	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged) To be Removed
VLL6EG-12	Generator			bhp	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced
	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged) To be Removed
VLL6EG-1R	Generator			bhp	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced
	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged) To be Removed
VLL6EG-2R	Generator			bhp	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced
	Diesel-Fired Emergency				20.2.72.202.B.3	2017	X Existing (unchanged) To be Removed
VLL1EG-N1	Generator			bkW	NA	2018	New/Additional Replacement Unit To Be Modified To be Replaced
	Diesel-Fired Emergency				20.2.72.202.B.3	2017	X Existing (unchanged) To be Removed
VLL1EG-N2	Generator			bkW	NA	2018	New/Additional Replacement Unit To Be Modified To be Replaced
	Diesel-Fired Emergency				20.2.72.202.B.3	2017	Existing (unchanged) X To be Removed
VLL1EG-N3	Generator			bkW	NA	2018	New/Additional Replacement Unit To Be Modified To be Replaced
	Diesel-Fired Emergency				20.2.72.202.B.3	2017	Existing (unchanged) X To be Removed
VLL1EG-N4	Generator			bkW	NA	2018	New/Additional Replacement Unit To Be Modified To be Replaced
VCN-EG-	Diesel-Fired Emergency				20.2.72.202.B.3	2024	Existing (unchanged) To be Removed
DCBX	Generator			bhp	NA	2025	X New/Additional Replacement Unit To Be Modified To be Replaced
VCN-EG-	Diesel-Fired Emergency				20.2.72.202.B.3	2024	Existing (unchanged) To be Removed
DCBY	Generator			bhp	NA	2025	X New/Additional Replacement Unit To Be Modified To be Replaced
VLL1EG-1-	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged) To be Removed
N1	Generator			bhp	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced
VLL1EG-1-	Diagal Fired Emanagement				20.2.72.202.B.3	2021	X Existing (unchanged) To be Removed
N2	Diesel-Fired Emergency Generator			bhp	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced
				oup	20.2.72.202.B.3	2021	*
VLL1EG-1-	Diesel-Fired Emergency						X Existing (unchanged) To be Removed New/Additional Replacement Unit
N3	Generator			bhp	NA	2021	To Be Modified To be Replaced

Unit Number	Source Description	scription Manufacturer		Max Capacity Capacity Units	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5) Insignificant Activity citation (e.g. IA List	Manufacture /Reconstruction <sup>2</sup> Date of Installation	- For Each Piece of Equipment, Check Onc		
			Serial No.	cupacity onlis	Item #1.a)	/Construction <sup>2</sup>			
VLL1EG-1-	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged) New/Additional	To be Removed Replacement Unit	
N4	Generator			bhp	NA	2021	To Be Modified	To be Replaced	
VLL2EG-N1	Diesel-Fired Emergency	_			20.2.72.202.B.3	2018	X Existing (unchanged) New/Additional	To be Removed Replacement Unit	
· EEEE 0 III	Generator			bkW	NA	2018	To Be Modified	To be Replaced	
VLL2EG-N2	Diesel-Fired Emergency				20.2.72.202.B.3	2017	X Existing (unchanged) New/Additional	To be Removed Replacement Unit	
VEL2EG-INZ	Generator			bkW	NA	2018	To Be Modified	To be Replaced	
VLL2EG-N3	Diesel-Fired Emergency				20.2.72.202.B.3	2018	X Existing (unchanged) New/Additional	To be Removed Replacement Unit	
VLL2LG-INJ	Generator			bkW	NA	2018	To Be Modified	To be Replaced	
VLL2EG-N4	Diesel-Fired Emergency				20.2.72.202.B.3	2017	X Existing (unchanged)	To be Removed	
VLLZEG-IN4	Generator			bkW	NA	2018	New/Additional To Be Modified	Replacement Unit To be Replaced	
	Diesel-Fired Emergency				20.2.72.202.B.3	2019	X Existing (unchanged)	To be Removed	
VLL3EG-N1	Generator			bhp	NA	2019	New/Additional To Be Modified	Replacement Unit To be Replaced	
	Diesel-Fired Emergency				20.2.72.202.B.3	2019	X Existing (unchanged)	To be Removed	
VLL3EG-N2	Generator			bhp	NA	2019	New/Additional To Be Modified	Replacement Unit To be Replaced	
	Diesel-Fired Emergency				20.2.72.202.B.3	2019	X Existing (unchanged)	To be Removed	
VLL3EG-N3	Generator			bhp	NA	2019	New/Additional To Be Modified	Replacement Unit To be Replaced	
	Diesel-Fired Emergency			· · · ·	20.2.72.202.B.3	2019	X Existing (unchanged)	To be Removed	
VLL3EG-N4	Generator			bhp	NA	2019	New/Additional To Be Modified	Replacement Unit To be Replaced	
	Diesel-Fired Emergency				20.2.72.202.B.3	2020	X Existing (unchanged)	To be Removed	
VLL5EG-N1	Generator			bhp	NA	2020	New/Additional To Be Modified	Replacement Unit To be Replaced	
	Diesel-Fired Emergency			1	20.2.72.202.B.3	2020	X Existing (unchanged)	To be Removed	
VLL5EG-N2	Generator			bhp	NA	2020	New/Additional To Be Modified	Replacement Unit To be Replaced	
	Diesel-Fired Emergency				20.2.72.202.B.3	2020	X Existing (unchanged)	To be Removed	
VLL5EG-N3	Generator			bhp	NA	2020	New/Additional To Be Modified	Replacement Unit To be Replaced	
	Diesel-Fired Emergency			onp	20.2.72.202.B.3	2020	X Existing (unchanged)	To be Removed	
VLL5EG-N4	Generator			bhp	NA	2020	New/Additional To Be Modified	Replacement Unit To be Replaced	
				onp	20.2.72.202.B.3	2020		•	
VLL6EG-N1	Diesel-Fired Emergency						X Existing (unchanged) New/Additional	To be Removed Replacement Unit	
	Generator			bhp	NA	2021	To Be Modified	To be Replaced	
VLL6EG-N2	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged) New/Additional	To be Removed Replacement Unit	
V LLUEG-INZ	Generator			bhp	NA	2021	To Be Modified	To be Replaced	
	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged)	To be Removed	
VLL6EG-N3	Generator			bhp	NA	2021	New/Additional To Be Modified	Replacement Unit To be Replaced	
	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged)	To be Removed	
VLL6EG-N4	Generator			bhp	NA	2021	New/Additional To Be Modified	Replacement Unit To be Replaced	
				onp	20.2.72.202.B.3	2021	X Existing (unchanged)	To be Replaced	
VLL1EG-A1	Diesel-Fired Emergency Generator			bhp	NA	2021	New/Additional To Be Modified	Replacement Unit To be Replaced	
				oup	NA 20.2.72.202.B.3	2021	To Be Modified X Existing (unchanged)	To be Replaced To be Removed	
/CN1EG- A1	Diesel-Fired Emergency Generator			bhp	20.2.72.202.B.3	2021	New/Additional	Replacement Unit	

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction <sup>2</sup>	For Each Piece of Equipment, Check Onc			
	·		Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction <sup>2</sup> 2021				
VCN1EG-N1	Diesel-Fired Emergency				20.2.72.202.B.3		X Existing (unchanged)	To be Removed Replacement Unit		
CNIEG-NI	Generator			bhp	NA	2022	New/Additional To Be Modified	Replacement Unit To be Replaced		
	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged)	To be Removed		
CN1EG-N2	Generator	-		bhp	NA	2022	New/Additional To Be Modified	Replacement Unit To be Replaced		
	Diesel-Fired Emergency			*	20.2.72.202.B.3	2021	X Existing (unchanged)	To be Removed		
CN1EG-N3	Generator			bhp	NA	2022	New/Additional To Be Modified	Replacement Unit To be Replaced		
				bhp	20.2.72.202.B.3	2022	X Existing (unchanged)	To be Removed		
CN1EG-N4	Diesel-Fired Emergency Generator			hha		2021	New/Additional	Replacement Unit		
				bhp	NA		To Be Modified X Existing (unchanged)	To be Replaced To be Removed		
CN2EG-N1	Diesel-Fired Emergency	-			20.2.72.202.B.3	2021	New/Additional	Replacement Unit		
	Generator			bhp	NA	2022	To Be Modified	To be Replaced		
CN2EG-N2	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged) New/Additional	To be Removed Replacement Unit		
	Generator			bhp	NA	2022	To Be Modified	To be Replaced		
CN2EG-N3	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged) New/Additional	To be Removed Replacement Unit		
CINZEG-IN5	Generator			bhp	NA	2022	To Be Modified	To be Replaced		
	Diesel-Fired Emergency				20.2.72.202.B.3	2021	X Existing (unchanged)	To be Removed		
CN2EG-N4	Generator			bhp	NA	2022	New/Additional To Be Modified	Replacement Unit To be Replaced		
	Diesel-Fired Emergency				20.2.72.202.B.3	2022	X Existing (unchanged)	To be Removed		
CN3EG-N1	Generator			bhp	NA	2023	New/Additional To Be Modified	Replacement Unit To be Replaced		
	D'1 E' 1 E			onp	20.2.72.202.B.3	2023	X Existing (unchanged)	To be Removed		
CN3EG-N2	Diesel-Fired Emergency Generator	-		bhp	NA	2022	New/Additional	Replacement Unit		
				blip			To Be Modified	To be Replaced		
CN3EG-N3	Diesel-Fired Emergency				20.2.72.202.B.3	2022	X Existing (unchanged) New/Additional	To be Removed Replacement Unit		
	Generator			bhp	NA	2023	To Be Modified	To be Replaced		
	Diesel-Fired Emergency				20.2.72.202.B.3	2022	X Existing (unchanged)	To be Removed		
CN3EG-N4	Generator	-		bhp	NA	2023	New/Additional To Be Modified	Replacement Unit To be Replaced		
	Diesel-Fired Emergency				20.2.72.202.B.3	2022	X Existing (unchanged)	To be Removed		
VCN4EG-1	Generator			bhp	NA	2023	New/Additional To Be Modified	Replacement Unit To be Replaced		
				onp	20.2.72.202.B.3	2023	X Existing (unchanged)	To be Removed		
CN5EG-N1	Diesel-Fired Emergency Generator						New/Additional	Replacement Unit		
	Generator			bhp	NA	2024	To Be Modified	To be Replaced		
CN5EG-N2	Diesel-Fired Emergency				20.2.72.202.B.3	2023	X Existing (unchanged) New/Additional	To be Removed Replacement Unit		
	Generator			bhp	NA	2024	To Be Modified	To be Replaced		
CN5EG-N3	Diesel-Fired Emergency				20.2.72.202.B.3	2023	X Existing (unchanged) New/Additional	To be Removed Replacement Unit		
	Generator			bhp	NA	2024	To Be Modified	To be Replaced		
CN5EG-N4	Diesel-Fired Emergency				20.2.72.202.B.3	2023	X Existing (unchanged) New/Additional	To be Removed Replacement Unit		
01010-114	Generator			bhp	NA	2024	To Be Modified	To be Replaced		
ONCE ON MIL	Diesel-Fired Emergency				20.2.72.202.B.3	2023	X Existing (unchanged)	To be Removed		
CN6EG-N1	Generator			bhp	NA	2024	New/Additional To Be Modified	Replacement Unit To be Replaced		
	Diesel-Fired Emergency				20.2.72.202.B.3	2023	X Existing (unchanged)	To be Removed		
CN6EG-N2	Generator			bhp	NA	2024	New/Additional To Be Modified	Replacement Unit To be Replaced		
				<u>r</u>	20.2.72.202.B.3	2023	X Existing (unchanged)	To be Removed		
	Diesel-Fired Emergency									

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction <sup>2</sup>	For Fach Piece of I	Equipment, Check Onc
Unit Number	Source Description	Manufacturer	Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction <sup>2</sup>	FOF EACH FIECE OF	24шртен, Спеск Опс
CONCERNA	Diesel-Fired Emergency				20.2.72.202.B.3	2023	X Existing (unchanged)	To be Removed
/CN6EG-N4	Generator			bhp	NA	2024	New/Additional To Be Modified	Replacement Unit To be Replaced
	Diesel-Fired Emergency			TBD	20.2.72.202.B.3	TBD	X Existing (unchanged)	To be Removed
TMP-1	Generator (Temporary)			bkW	NA	TBD	New/Additional To Be Modified	Replacement Unit To be Replaced
	Diesel-Fired Emergency			TBD	20.2.72.202.B.3	TBD	X Existing (unchanged)	To be Removed
TMP-2	Generator (Temporary)			bkW	NA	TBD	New/Additional To Be Modified	Replacement Unit To be Replaced
	D' 1E' 1E' D			240	20.2.72.202.A.4	TBD	X Existing (unchanged)	To be Removed
Fire Pump 1	Diesel-Fired Fire Pump			bkW	NA	TBD	New/Additional To Be Modified	Replacement Unit To be Replaced
	D: 10: 10: D			TBD	20.2.72.202.A.4	TBD	Existing (unchanged)	To be Removed
Fire Pump 2	Diesel-Fired Fire Pump			bhp	NA	TBD	X New/Additional To Be Modified	Replacement Unit To be Replaced
# L 1007 -	D' 10 " T 1				20.2.72.202.B.2	2017	X Existing (unchanged)	To be Removed
/LL1DBT-1	Diesel Belly Tank			gallons	NA	2018	New/Additional To Be Modified	Replacement Unit To be Replaced
	D: 1D " = ·				20.2.72.202.B.2	2017	X Existing (unchanged)	To be Removed
/LL1DBT-2	Diesel Belly Tank			gallons	NA	2018	New/Additional To Be Modified	Replacement Unit To be Replaced
					20.2.72.202.B.2	2017	X Existing (unchanged)	To be Removed
/LL1DBT-3	Diesel Belly Tank			gallons	NA	2018	New/Additional To Be Modified	Replacement Unit To be Replaced
				5	20.2.72.202.B.2	2017	X Existing (unchanged)	To be Removed
/LL1DBT-4	Diesel Belly Tank			gallons	NA	2018	New/Additional To Be Modified	Replacement Unit To be Replaced
				5	20.2.72.202.B.2	2017	X Existing (unchanged)	To be Removed
/LL1DBT-5	Diesel Belly Tank			gallons	NA	2018	New/Additional To Be Modified	Replacement Unit To be Replaced
					20.2.72.202.B.2	2017	X Existing (unchanged)	To be Removed
/LL1DBT-6	Diesel Belly Tank			gallons	NA	2018	New/Additional To Be Modified	Replacement Unit To be Replaced
VLL1DBT-7	Diesel Belly Tank				20.2.72.202.B.2	2017	X Existing (unchanged) New/Additional	To be Removed Replacement Unit
VLLIDBI-/	Diesei Belly Talik			gallons	NA	2018	To Be Modified	To be Replaced
VLL1DBT-8	Diesel Belly Tank				20.2.72.202.B.2	2017	X Existing (unchanged) New/Additional	To be Removed Replacement Unit
VLLIDBI-0	Diesei Belly Talik			gallons	NA	2018	To Be Modified	To be Replaced
/LL1DBT-9	Discul Dalles Taula				20.2.72.202.B.2	2017	X Existing (unchanged) New/Additional	To be Removed Replacement Unit
LLIDBI-9	Diesel Belly Tank			gallons	NA	2018	To Be Modified	To be Replaced
LIDDT 10	Dissal D. II. T				20.2.72.202.B.2	2017	X Existing (unchanged)	To be Removed
LL1DBT-10	Diesel Belly Tank			gallons	NA	2018	New/Additional To Be Modified	Replacement Unit To be Replaced
LIDDT 1					20.2.72.202.B.2	2017	X Existing (unchanged)	To be Removed
LL1DBT-11	Diesel Belly Tank			gallons	NA	2018	New/Additional To Be Modified	Replacement Unit To be Replaced
	D: 1D " = ·				20.2.72.202.B.2	2017	X Existing (unchanged)	To be Removed
LL1DBT-12	Diesel Belly Tank			gallons	NA	2018	New/Additional To Be Modified	Replacement Unit To be Replaced
	D: 1D " = ·				20.2.72.202.B.2	2017	X Existing (unchanged)	To be Removed
LL1DBT-1R	Diesel Belly Tank			gallons	NA	2018	New/Additional To Be Modified	Replacement Unit To be Replaced
					20.2.72.202.B.2	2017	X Existing (unchanged)	To be Removed
LL1DBT-2R	Diesel Belly Tank			gallons	NA	2018	New/Additional To Be Modified	Replacement Unit To be Replaced
					20.2.72.202.B.2	2018	X Existing (unchanged)	To be Removed
/LL2DBT-1	Diesel Belly Tank			gallons	NA	2018	New/Additional To Be Modified	Replacement Unit To be Replaced
				5-110115	20.2.72.202.B.2	2018	X Existing (unchanged)	To be Removed
VLL2DBT-2	Diesel Belly Tank			gallons	NA	2018	New/Additional To Be Modified	Replacement Unit To be Replaced
					20.2.72.202.B.2	2018	X Existing (unchanged)	To be Removed
/LL2DBT-3	Diesel Belly Tank	1 4					New/Additional	Replacement Unit

Unit Number Source Descriptio		Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction <sup>2</sup>	For Each Picco of I	Equipment, Check Onc
Unit Number	Source Description	Wanuacturer	Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction <sup>2</sup>	FOR Each Flece of	Equipment, Check One
					20.2.72.202.B.2	2018	X Existing (unchanged)	To be Removed
VLL2DBT-4	Diesel Belly Tank			gallons	NA	2018	New/Additional To Be Modified	Replacement Unit To be Replaced
					20.2.72.202.B.2	2018	X Existing (unchanged)	To be Removed
VLL2DBT-5	Diesel Belly Tank			gallons	NA	2018	New/Additional To Be Modified	Replacement Unit To be Replaced
				ganons	20.2.72.202.B.2	2018	X Existing (unchanged)	To be Removed
VLL2DBT-6	Diesel Belly Tank			gallons	NA	2018	New/Additional To Be Modified	Replacement Unit To be Replaced
				ganons	20.2.72.202.B.2	2018	X Existing (unchanged)	To be Removed
VLL2DBT-7	Diesel Belly Tank			gallons	NA	2010	New/Additional To Be Modified	Replacement Unit To be Replaced
				ganons	20.2.72.202.B.2	2019	X Existing (unchanged)	To be Removed
VLL2DBT-8	Diesel Belly Tank			gallons	NA	2010	New/Additional	Replacement Unit
				Banons	20.2.72.202.B.2	2019	To Be Modified X Existing (unchanged)	To be Replaced To be Removed
VLL2DBT-9	Diesel Belly Tank			gallons	20.2.72.202.B.2 NA	2018	New/Additional To Be Modified	Replacement Unit
				ganons	20.2.72.202.B.2	2019	X Existing (unchanged)	To be Replaced To be Removed
VLL2DBT-10	Diesel Belly Tank			gallons	20.2.72.202.B.2 NA	2018	New/Additional	Replacement Unit
				ganons	20.2.72.202.B.2	2019	To Be Modified X Existing (unchanged)	To be Replaced To be Removed
VLL2DBT-11	Diesel Belly Tank			11			New/Additional	Replacement Unit
				gallons	NA	2019	To Be Modified X Existing (unchanged)	To be Replaced To be Removed
VLL2DBT-12	Diesel Belly Tank				20.2.72.202.B.2	2018	New/Additional	Replacement Unit
				gallons	NA	2019	To Be Modified X Existing (unchanged)	To be Replaced To be Removed
/LL2DBT-1R	Diesel Belly Tank				20.2.72.202.B.2	2017	New/Additional	Replacement Unit
				gallons	NA	2018	To Be Modified	To be Replaced To be Removed
/LL2DBT-2R	Diesel Belly Tank			_	20.2.72.202.B.2	2018	X Existing (unchanged) New/Additional	Replacement Unit
				gallons	NA	2019	To Be Modified X Existing (unchanged)	To be Replaced To be Removed
VLL3DBT-1	Diesel Belly Tank			_	20.2.72.202.B.2	2019	New/Additional	Replacement Unit
				gallons	NA	2019	To Be Modified	To be Replaced
VLL3DBT-2	Diesel Belly Tank				20.2.72.202.B.2	2019	X Existing (unchanged) New/Additional	To be Removed Replacement Unit
	•			gallons	NA	2019	To Be Modified	To be Replaced
VLL3DBT-3	Diesel Belly Tank				20.2.72.202.B.2	2019	X Existing (unchanged) New/Additional	To be Removed Replacement Unit
VLLJDD1-J	Dieser Deny Fank			gallons	NA	2019	To Be Modified	To be Replaced
					20.2.72.202.B.2	2019	X Existing (unchanged)	To be Removed
VLL3DBT-4	Diesel Belly Tank			gallons	NA	2019	New/Additional To Be Modified	Replacement Unit To be Replaced
		1			20.2.72.202.B.2	2019	X Existing (unchanged)	To be Removed
VLL3DBT-5	Diesel Belly Tank			gallons	NA	2019	New/Additional To Be Modified	Replacement Unit To be Replaced
				ganons	20.2.72.202.B.2	2019	X Existing (unchanged)	To be Removed
VLL3DBT-6	Diesel Belly Tank			an <sup>11</sup>			New/Additional	Replacement Unit
				gallons	NA	2019	To Be Modified	To be Replaced
VLL3DBT-7	Diesel Belly Tank				20.2.72.202.B.2	2019	X Existing (unchanged) New/Additional	To be Removed Replacement Unit
	,			gallons	NA	2020	To Be Modified	To be Replaced
VII 2DDT 9	Dissel Dally Tarl-				20.2.72.202.B.2	2019	X Existing (unchanged)	To be Removed
VLL3DBT-8	Diesel Belly Tank			gallons	NA	2020	New/Additional To Be Modified	Replacement Unit To be Replaced
					20.2.72.202.B.2	2019	X Existing (unchanged)	To be Removed
VLL3DBT-9	Diesel Belly Tank	1					New/Additional	Replacement Unit

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction <sup>2</sup>	- For Each Piece of Equipment, Check Onc		
Olite Number	Source Description	Manufacturer	Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction <sup>2</sup>	FOI EACH LIECE OF	equipment, Check One	
					20.2.72.202.B.2	2019	X Existing (unchanged)	To be Removed	
VLL3DBT-10	Diesel Belly Tank			gallons	NA	2020	New/Additional To Be Modified	Replacement Unit To be Replaced	
VILLADDT 11					20.2.72.202.B.2	2019	X Existing (unchanged) New/Additional	To be Removed	
VLL3DBT-11	Diesel Belly Tank			gallons	NA	2020	To Be Modified	Replacement Unit To be Replaced	
					20.2.72.202.B.2	2019	X Existing (unchanged)	To be Removed	
VLL3DBT-12	Diesel Belly Tank			gallons	NA	2020	New/Additional To Be Modified	Replacement Unit To be Replaced	
					20.2.72.202.B.2	2019	X Existing (unchanged)	To be Removed	
/LL3DBT-1R	Diesel Belly Tank			gallons	NA	2019	New/Additional To Be Modified	Replacement Unit To be Replaced	
					20.2.72.202.B.2	2019	X Existing (unchanged)	To be Removed	
VLL3DBT-2R	Diesel Belly Tank			gallons	NA	2020	New/Additional To Be Modified	Replacement Unit To be Replaced	
					20.2.72.202.B.2	2019	X Existing (unchanged)	To be Removed	
VLL4DBT-1	Diesel Belly Tank			gallons	NA	2020	New/Additional To Be Modified	Replacement Unit To be Replaced	
		1		5	20.2.72.202.B.2	2020	X Existing (unchanged)	To be Removed	
VLL5DBT-1	Diesel Belly Tank			gallons	NA	2021	New/Additional To Be Modified	Replacement Unit To be Replaced	
				S	20.2.72.202.B.2	2020	X Existing (unchanged)	To be Removed	
VLL5DBT-2	Diesel Belly Tank			gallons	NA	2021	New/Additional To Be Modified	Replacement Unit To be Replaced	
				ganons	20.2.72.202.B.2	2021	X Existing (unchanged)	To be Removed	
VLL5DBT-3	Diesel Belly Tank			gallons	NA	2020	New/Additional	Replacement Unit	
				ganons	20.2.72.202.B.2	2021	To Be Modified X Existing (unchanged)	To be Replaced To be Removed	
VLL5DBT-4	Diesel Belly Tank				20.2.72.202.B.2 NA	2020	New/Additional	Replacement Unit	
				gallons	NA 20.2.72.202.B.2	2021	To Be Modified X Existing (unchanged)	To be Replaced To be Removed	
VLL5DBT-5	Diesel Belly Tank						New/Additional	Replacement Unit	
				gallons	NA 20.2.72.202.B.2	2021 2020	To Be Modified X Existing (unchanged)	To be Replaced To be Removed	
VLL5DBT-6	Diesel Belly Tank						New/Additional	Replacement Unit	
				gallons	NA	2021	To Be Modified X Existing (unchanged)	To be Replaced To be Removed	
VLL5DBT-7	Diesel Belly Tank				20.2.72.202.B.2	2020	New/Additional	Replacement Unit	
				gallons	NA	2021	To Be Modified	To be Replaced To be Removed	
VLL5DBT-8	Diesel Belly Tank			_	20.2.72.202.B.2	2020	X Existing (unchanged) New/Additional	Replacement Unit	
				gallons	NA	2021	To Be Modified	To be Replaced	
VLL5DBT-9	Diesel Belly Tank				20.2.72.202.B.2	2020	X Existing (unchanged) New/Additional	To be Removed Replacement Unit	
	,			gallons	NA	2021	To Be Modified	To be Replaced	
VLL5DBT-10	Diesel Belly Tank				20.2.72.202.B.2	2020	X Existing (unchanged) New/Additional	To be Removed Replacement Unit	
	, 1 uni			gallons	NA	2021	To Be Modified	To be Replaced	
VLL5DBT-11	Diesel Belly Tank				20.2.72.202.B.2	2020	X Existing (unchanged) New/Additional	To be Removed Replacement Unit	
	Sieser Beny Tunk			gallons	NA	2021	To Be Modified	To be Replaced	
VLL5DBT-12	Diesel Belly Tank				20.2.72.202.B.2	2020	X Existing (unchanged) New/Additional	To be Removed Replacement Unit	
. 2232201-12	Dieser Deny Fank			gallons	NA	2021	To Be Modified	To be Replaced	
VLL5DBT-1R	Diesel Belly Tank				20.2.72.202.B.2	2020	X Existing (unchanged) New/Additional	To be Removed Replacement Unit	
LLJDD1-IK	Diesei belly Talik			gallons	NA	2021	To Be Modified	To be Replaced	
UL CODT OD	Discil Dalles Taul				20.2.72.202.B.2	2020	X Existing (unchanged)	To be Removed	
VLL5DBT-2R	Diesel Belly Tank			gallons	NA	2021	New/Additional To Be Modified	Replacement Unit To be Replaced	
					20.2.72.202.B.2	2021	X Existing (unchanged)	To be Removed	
VLL6DBT-1	Diesel Belly Tank			gallons	NA	2021	New/Additional To Be Modified	Replacement Unit To be Replaced	
					20.2.72.202.B.2	2021	X Existing (unchanged)	To be Removed	
VLL6DBT-2	Diesel Belly Tank	1 4			NA	2021	New/Additional	Replacement Unit	

Unit Namban	Same Description	Manufacture	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction <sup>2</sup>	For Each Piece of Equipment, Check Onc		
Unit Number	Source Description	Manufacturer	Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction <sup>2</sup>	For Each Piece of Equipment, Check Onc		
VILLODT 2	Discil Dalla Taula				20.2.72.202.B.2	2021	X Existing (unchanged) To be Removed		
VLL6DBT-3	Diesel Belly Tank			gallons	NA	2021	New/Additional         Replacement Unit           To Be Modified         To be Replaced		
MIL (DDT 4					20.2.72.202.B.2	2021	X Existing (unchanged) To be Removed		
VLL6DBT-4	Diesel Belly Tank			gallons	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced		
					20.2.72.202.B.2	2021	X Existing (unchanged) To be Removed		
VLL6DBT-5	Diesel Belly Tank			gallons	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced		
					20.2.72.202.B.2	2021	X Existing (unchanged) To be Removed		
VLL6DBT-6	Diesel Belly Tank			gallons	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced		
ULL CODT A					20.2.72.202.B.2	2021	X Existing (unchanged) To be Removed		
VLL6DBT-7	Diesel Belly Tank			gallons	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced		
					20.2.72.202.B.2	2021	X Existing (unchanged) To be Removed		
VLL6DBT-8	Diesel Belly Tank			gallons	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced		
					20.2.72.202.B.2	2021	X Existing (unchanged) To be Removed		
VLL6DBT-9	Diesel Belly Tank			gallons	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced		
					20.2.72.202.B.2	2021	X Existing (unchanged) To be Removed		
VLL6DBT-10	Diesel Belly Tank			gallons	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced		
				5	20.2.72.202.B.2	2021	X Existing (unchanged) To be Removed		
VLL6DBT-11	Diesel Belly Tank			gallons	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced		
				S	20.2.72.202.B.2	2021	X Existing (unchanged) To be Removed		
VLL6DBT-12	Diesel Belly Tank			gallans	NA	2021	New/Additional Replacement Unit		
				gallons			To Be Modified To be Replaced		
VLL6DBT-1R	Diesel Belly Tank				20.2.72.202.B.2	2021	X Existing (unchanged) To be Removed New/Additional Replacement Unit		
· LLOBBT III	Dieser Deny Fank			gallons	NA	2021	To Be Modified To be Replaced		
					20.2.72.202.B.2	2021	X Existing (unchanged) To be Removed		
VLL6DBT-2R	Diesel Belly Tank			gallons	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced		
				5	20.2.72.202.B.2	2017	X Existing (unchanged) To be Removed		
VLL1DBT-N1	Diesel Belly Tank						New/Additional Replacement Unit		
				gallons	NA	2018	To Be Modified To be Replaced		
VLL1DBT-N2	Diesel Belly Tank				20.2.72.202.B.2	2017	X Existing (unchanged) To be Removed New/Additional Replacement Unit		
				gallons	NA	2018	To Be Modified To be Replaced		
VLL1DBT-N3	Diesel Belly Tank				20.2.72.202.B.2	2017	Existing (unchanged) X To be Removed New/Additional Replacement Unit		
-	,			gallons	NA	2018	To Be Modified To be Replaced		
VLL1DBT-N4	Diesel Belly Tank				20.2.72.202.B.2	2017	Existing (unchanged) X To be Removed New/Additional Replacement Unit		
	<i>ony</i> 1 mm			gallons	NA	2018	To Be Modified To be Replaced		
VCN-DBT-	Diesel Belly Tank				20.2.72.202.B.2	2024	Existing (unchanged) To be Removed X New/Additional Replacement Unit		
DCBX	Dieser Deny Tunk			gallons	NA	2025	To Be Modified To be Replaced		
VCN-DBT-	Diesel Belly Tank				20.2.72.202.B.2	2024	Existing (unchanged) To be Removed X New/Additional Replacement Unit		
DCBY	Dieser Deny Tank			gallons	NA	2025	To Be Modified To be Replaced		
VLL1DBT-1-	Diesel Belly Tank				20.2.72.202.B.2	2021	X Existing (unchanged) To be Removed New/Additional Replacement Unit		
N1	Dieser Delly Tallk			gallons	NA	2021	To Be Modified To be Replaced		
VLL1DBT-1-	Diesel Belly Tank				20.2.72.202.B.2	2021	X Existing (unchanged) To be Removed		
N2	Diesei belly Tank			gallons	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced		
VLL1DBT-1-					20.2.72.202.B.2	2021	X Existing (unchanged) To be Removed		
N3	Diesel Belly Tank			gallons	NA	2021	New/Additional         Replacement Unit           To Be Modified         To be Replaced		
VLL1DBT-1-	D: 10 " = 1				20.2.72.202.B.2	2021	X Existing (unchanged) To be Removed		
N4	Diesel Belly Tank			gallons	NA	2021	New/Additional Replacement Unit To Be Modified To be Replaced		
					20.2.72.202.B.2	2018	X Existing (unchanged) To be Removed		
VLL2DBT-N1	Diesel Belly Tank						New/Additional Replacement Unit		

Unit Number	Source Description	Manufacture	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction <sup>2</sup>	For Each Piece of Equipment, Check Onc		
Unit Number	Source Description	Manufacturer	Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction <sup>2</sup>	For Each Piece of I	2quipment, Check Onc	
VI LODDT NO	Discil Dalla Taula				20.2.72.202.B.2	2017	X Existing (unchanged)	To be Removed	
VLL2DBT-N2	Diesel Belly Tank			gallons	NA	2018	New/Additional To Be Modified	Replacement Unit To be Replaced	
					20.2.72.202.B.2	2018	X Existing (unchanged)	To be Removed	
VLL2DBT-N3	Diesel Belly Tank			gallons	NA	2018	New/Additional To Be Modified	Replacement Unit To be Replaced	
					20.2.72.202.B.2	2017	X Existing (unchanged)	To be Removed	
VLL2DBT-N4	Diesel Belly Tank			gallons	NA	2018	New/Additional To Be Modified	Replacement Unit To be Replaced	
					20.2.72.202.B.2	2019	X Existing (unchanged)	To be Removed	
VLL3DBT-N1	Diesel Belly Tank			gallons	NA	2019	New/Additional To Be Modified	Replacement Unit To be Replaced	
					20.2.72.202.B.2	2019	X Existing (unchanged)	To be Removed	
VLL3DBT-N2	Diesel Belly Tank			gallons	NA	2019	New/Additional To Be Modified	Replacement Unit To be Replaced	
				5	20.2.72.202.B.2	2019	X Existing (unchanged)	To be Removed	
VLL3DBT-N3	Diesel Belly Tank			gallons	NA	2019	New/Additional To Be Modified	Replacement Unit To be Replaced	
				5	20.2.72.202.B.2	2019	X Existing (unchanged)	To be Removed	
VLL3DBT-N4	Diesel Belly Tank			gallons	NA	2019	New/Additional To Be Modified	Replacement Unit To be Replaced	
				ganons	20.2.72.202.B.2	2019	X Existing (unchanged)	To be Removed	
VLL5DBT-N1	Diesel Belly Tank			collons	NA	2020	New/Additional	Replacement Unit	
				gallons	20.2.72.202.B.2	2020	To Be Modified X Existing (unchanged)	To be Replaced To be Removed	
VLL5DBT-N2	Diesel Belly Tank						New/Additional	Replacement Unit	
				gallons	NA	2020	To Be Modified X Existing (unchanged)	To be Replaced To be Removed	
VLL5DBT-N3	Diesel Belly Tank				20.2.72.202.B.2	2020	New/Additional	Replacement Unit	
				gallons	NA	2020	To Be Modified	To be Replaced	
VLL5DBT-N4	Diesel Belly Tank			_	20.2.72.202.B.2	2020	X Existing (unchanged) New/Additional	To be Removed Replacement Unit	
				gallons	NA	2020	To Be Modified	To be Replaced	
VLL6DBT-N1	Diesel Belly Tank			_	20.2.72.202.B.2	2021	X Existing (unchanged) New/Additional	To be Removed Replacement Unit	
				gallons	NA	2021	To Be Modified	To be Replaced	
VLL6DBT-N2	Diesel Belly Tank				20.2.72.202.B.2	2021	X Existing (unchanged) New/Additional	To be Removed Replacement Unit	
				gallons	NA	2021	To Be Modified	To be Replaced	
VLL6DBT-N3	Diesel Belly Tank				20.2.72.202.B.2	2021	X Existing (unchanged) New/Additional	To be Removed Replacement Unit	
				gallons	NA	2021	To Be Modified	To be Replaced	
VLL6DBT-N4	Diesel Belly Tank				20.2.72.202.B.2	2021	X Existing (unchanged) New/Additional	To be Removed Replacement Unit	
· EEOBBT	Bieser Beny Fank			gallons	NA	2021	To Be Modified	To be Replaced	
VLL1DBT-A1	Diesel Belly Tank				20.2.72.202.B.2	2021	X Existing (unchanged) New/Additional	To be Removed Replacement Unit	
· SEIDDI-AI	Dieser Delly Talik			gallons	NA	2021	To Be Modified	To be Replaced	
VCN1DBT-	Diesel Belly Tank				20.2.72.202.B.2	2021	X Existing (unchanged) New/Additional	To be Removed Replacement Unit	
A1	Dieser Delly Fallk			gallons	NA	2022	To Be Modified	To be Replaced	
VCN1DBT-	Diesel Belly Tank				20.2.72.202.B.2	2021	X Existing (unchanged) New/Additional	To be Removed Replecement Unit	
N1	Diesei Delly Talik			gallons	NA	2022	To Be Modified	Replacement Unit To be Replaced	
VCN1DBT-	Discal D. II- T. I.				20.2.72.202.B.2	2021	X Existing (unchanged)	To be Removed	
N2	Diesel Belly Tank			gallons	NA	2022	New/Additional To Be Modified	Replacement Unit To be Replaced	
VCN1DBT-					20.2.72.202.B.2	2021	X Existing (unchanged)	To be Removed	
N3	Diesel Belly Tank			gallons	NA	2022	New/Additional To Be Modified	Replacement Unit To be Replaced	
VCN1DBT-	D: 10 " = 1				20.2.72.202.B.2	2021	X Existing (unchanged)	To be Removed	
N4	Diesel Belly Tank			gallons	NA	2022	New/Additional To Be Modified	Replacement Unit To be Replaced	
					20.2.72.202.B.2	2021	X Existing (unchanged)	To be Removed	
VCN2DBT-N1	Diesel Belly Tank			gallons	NA	2022	New/Additional To Be Modified	Replacement Unit	
				Banons				To be Replaced	
VCN2DBT-N2	Diesel Belly Tank				20.2.72.202.B.2	2021	X Existing (unchanged) New/Additional	To be Removed Replacement Unit	
	,			gallons	NA	2022	To Be Modified	To be Replaced	

Unit Number	Source Description	Manufacturer	Model No. Serial No.	Max Capacity Capacity Units	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5) Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Manufacture /Reconstruction <sup>2</sup> Date of Installation /Construction <sup>2</sup>	For Each Piece of Equipment, Check Onc
					,		
VCN2DBT-N3	Diesel Belly Tank			gallons	20.2.72.202.B.2 NA	2021 2022	X Existing (unchanged)     To be Removed       New/Additional     Replacement Unit       To Be Modified     To be Replaced
					20.2.72.202.B.2	2021	X Existing (unchanged) To be Removed
VCN2DBT-N4	Diesel Belly Tank			gallons	NA	2022	New/Additional Replacement Unit To Be Modified To be Replaced
VCN3DBT-N1	Diesel Belly Tank				20.2.72.202.B.2	2022	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VCN3DB1-N1	Diesei Beily Talik			gallons	NA	2023	To Be Modified To be Replaced
VCN3DBT-N2	Diesel Belly Tank				20.2.72.202.B.2	2022	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VCN3DB1-N2	Dieser Beny Tank			gallons	NA	2023	To Be Modified To be Replaced
VCN3DBT-N3	Diesel Belly Tank				20.2.72.202.B.2	2022	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VCN3DB1-N3	Diesei Beily Talik			gallons	NA	2023	To Be Modified To be Replaced
VCN3DBT-N4	Diesel Belly Tank				20.2.72.202.B.2	2022	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VCN3DB1-N4	Diesei Beily Talik			gallons	NA	2023	To Be Modified To be Replaced
VCN4DBT-1	Diesel Belly Tank				20.2.72.202.B.2	2022	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VCIN4DB1-1	Diesei Beily Talik			gallons	NA	2023	To Be Modified To be Replaced
VCN5DBT-N1	Diesel Belly Tank				20.2.72.202.B.2	2023	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VCN5DB1-N1	Diesei Beily Talik			gallons	NA	2024	To Be Modified To be Replaced
VCN5DBT-N2	Diesel Belly Tank				20.2.72.202.B.2	2023	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VCN3DB1-N2	Dieser Beny Tank			gallons	NA	2024	To Be Modified To be Replaced
VCN5DBT-N3	Diesel Belly Tank				20.2.72.202.B.2	2023	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VCN3DB1-N3	Dieser Beny Tank			gallons	NA	2024	To Be Modified To be Replaced
VCN5DBT-N4	Diesel Belly Tank				20.2.72.202.B.2	2023	X Existing (unchanged) To be Removed New/Additional Replacement Unit
VCN3DB1-N4	Dieser Beny Tank			gallons	NA	2024	To Be Modified To be Replaced
VCN6DBT-N1	Diesel Belly Tank				20.2.72.202.B.2	2023	X Existing (unchanged) To be Removed New/Additional Replacement Unit
10110001-111	Dieser Belly Talk			gallons	NA	2024	To Be Modified To be Replaced
VCN6DBT-N2	Diesel Belly Tank				20.2.72.202.B.2	2023	X Existing (unchanged) To be Removed New/Additional Replacement Unit
, CINOD D 1-112	Dieser Deny Tank			gallons	NA	2024	To Be Modified To be Replaced
VCN6DBT-N3	Diesel Belly Tank				20.2.72.202.B.2	2023	X Existing (unchanged) To be Removed New/Additional Replacement Unit
, CINDD 1-103	Diesei Deny Tank			gallons	NA	2024	To Be Modified To be Replaced
VCN6DBT-N4	Diesel Belly Tank				20.2.72.202.B.2	2023	X Existing (unchanged) To be Removed New/Additional Replacement Unit
v CINOD B 1-IN4	Diesei Delly Talik			gallons	NA	2024	To Be Modified To be Replaced

<sup>1</sup> Insignificant activities exempted due to size or production rate are defined in 20.2.70.300.D.6, 20.2.70.7.Q NMAC, and the NMED/AQB List of Insignificant Activities, dated September 15, 2008. Emissions from these insignificant activities do not need to be reported, unless specifically requested.

<sup>2</sup> Specify date(s) required to determine regulatory applicability.

### **Table 2-C: Emissions Control Equipment**

Unit and stack numbering must correspond throughout the application package. Only list control equipment for TAPs if the TAP's maximum uncontrolled emissions rate is over its respective threshold as listed in 20.2.72 NMAC, Subpart V, Tables A and B. 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.

Control Equipment Unit No.	Control Equipment Description	Date Installed	Controlled Pollutant(s)	Controlling Emissions for Unit Number(s) <sup>1</sup>	Efficiency (% Control by Weight)	Method used to Estimate Efficiency
VLL5EG-1	SCR	2021	NOx	VLL5EG-1	90%	Manufacturer Data
VLL5EG-2	SCR	2021	NOx	VLL5EG-2	90%	Manufacturer Data
VLL5EG-3	SCR	2021	NOx	VLL5EG-3	90%	Manufacturer Data
VLL5EG-4	SCR	2021	NOx	VLL5EG-4	90%	Manufacturer Data
VLL5EG-5	SCR	2021	NOx	VLL5EG-5	90%	Manufacturer Data
VLL5EG-6	SCR	2021	NOx	VLL5EG-6	90%	Manufacturer Data
VLL5EG-7	SCR	2021	NOx	VLL5EG-7	90%	Manufacturer Data
VLL5EG-8	SCR	2021	NOx	VLL5EG-8	90%	Manufacturer Data
VLL5EG-9	SCR	2021	NOx	VLL5EG-9	90%	Manufacturer Data
VLL5EG-10	SCR	2021	NOx	VLL5EG-10	90%	Manufacturer Data
VLL5EG-11	SCR	2021	NOx	VLL5EG-11	90%	Manufacturer Data
VLL5EG-12	SCR	2021	NOx	VLL5EG-12	90%	Manufacturer Data
VLL5EG-1R	SCR	2021	NOx	VLL5EG-1R	90%	Manufacturer Data
VLL5EG-2R	SCR	2021	NOx	VLL5EG-2R	90%	Manufacturer Data
VLL6EG-1	SCR	2021	NOx	VLL6EG-1	90%	Manufacturer Data
VLL6EG-2	SCR	2021	NOx	VLL6EG-2	90%	Manufacturer Data
VLL6EG-3	SCR	2021	NOx	VLL6EG-3	90%	Manufacturer Data
VLL6EG-4	SCR	2021	NOx	VLL6EG-4	90%	Manufacturer Data
VLL6EG-5	SCR	2021	NOx	VLL6EG-5	90%	Manufacturer Data
VLL6EG-6	SCR	2021	NOx	VLL6EG-6	90%	Manufacturer Data
VLL6EG-7	SCR	2021	NOx	VLL6EG-7	90%	Manufacturer Data
VLL6EG-8	SCR	2021	NOx	VLL6EG-8	90%	Manufacturer Data
VLL6EG-9	SCR	2021	NOx	VLL6EG-9	90%	Manufacturer Data
VLL6EG-10	SCR	2021	NOx	VLL6EG-10	90%	Manufacturer Data
VLL6EG-11	SCR	2021	NOx	VLL6EG-11	90%	Manufacturer Data
VLL6EG-12	SCR	2021	NOx	VLL6EG-12	90%	Manufacturer Data
VLL6EG-1R	SCR	2021	NOx	VLL6EG-1R	90%	Manufacturer Data
VLL6EG-2R	SCR	2021	NOx	VLL6EG-2R	90%	Manufacturer Data

Control Equipment Unit No.	<b>Control Equipment Description</b>	Date Installed	Controlled Pollutant(s)	Controlling Emissions for Unit Number(s) <sup>1</sup>	Efficiency (% Control by Weight)	Method used to Estimate Efficiency
VLL5EG-N1	SCR	2020	NOx	VLL5EG-N1	90%	Manufacturer Data
VLL5EG-N2	SCR	2020	NOx	VLL5EG-N2	90%	Manufacturer Data
VLL5EG-N3	SCR	2020	NOx	VLL5EG-N3	90%	Manufacturer Data
VLL5EG-N4	SCR	2020	NOx	VLL5EG-N4	90%	Manufacturer Data
VLL6EG-N1	SCR	2021	NOx	VLL6EG-N1	90%	Manufacturer Data
VLL6EG-N2	SCR	2021	NOx	VLL6EG-N2	90%	Manufacturer Data
VLL6EG-N3	SCR	2021	NOx	VLL6EG-N3	90%	Manufacturer Data
VLL6EG-N4	SCR	2021	NOx	VLL6EG-N4	90%	Manufacturer Data
VCN1EG-N1	SCR	2022	NOx	VCN1EG-N1	90%	Manufacturer Data
VCN1EG-N2	SCR	2022	NOx	VCN1EG-N2	90%	Manufacturer Data
VCN1EG-N3	SCR	2022	NOx	VCN1EG-N3	90%	Manufacturer Data
VCN1EG-N4	SCR	2022	NOx	VCN1EG-N4	90%	Manufacturer Data
VCN2EG-N1	SCR	2022	NOx	VCN2EG-N1	90%	Manufacturer Data
VCN2EG-N2	SCR	2022	NOx	VCN2EG-N2	90%	Manufacturer Data
VCN2EG-N3	SCR	2022	NOx	VCN2EG-N3	90%	Manufacturer Data
VCN2EG-N4	SCR	2022	NOx	VCN2EG-N4	90%	Manufacturer Data
VCN3EG-N1	SCR	2023	NOx	VCN3EG-N1	90%	Manufacturer Data
VCN3EG-N2	SCR	2023	NOx	VCN3EG-N2	90%	Manufacturer Data
VCN3EG-N3	SCR	2023	NOx	VCN3EG-N3	90%	Manufacturer Data
VCN3EG-N4	SCR	2023	NOx	VCN3EG-N4	90%	Manufacturer Data
VCN4EG-1	SCR	2023	NOx	VCN4EG-1	90%	Manufacturer Data
VCN5EG-N1	SCR	2024	NOx	VCN5EG-N1	90%	Manufacturer Data
VCN5EG-N2	SCR	2024	NOx	VCN5EG-N2	90%	Manufacturer Data
VCN5EG-N3	SCR	2024	NOx	VCN5EG-N3	90%	Manufacturer Data
VCN5EG-N4	SCR	2024	NOx	VCN5EG-N4	90%	Manufacturer Data
VCN6EG-N1	SCR	2024	NOx	VCN6EG-N1	90%	Manufacturer Data
VCN6EG-N2	SCR	2024	NOx	VCN6EG-N2	90%	Manufacturer Data
VCN6EG-N3	SCR	2024	NOx	VCN6EG-N3	90%	Manufacturer Data
VCN6EG-N4	SCR	2024	NOx	VCN6EG-N4	90%	Manufacturer Data
VCN-EG-DCBX	SCR	2025	NOx	VCN-EG-DCBX	90%	Manufacturer Data
VCN-EG-DCBY	SCR	2025	NOx	VCN-EG-DCBY	90%	Manufacturer Data

Control Equipment Unit No.	Control Equipment Description	Date Installed	Controlled Pollutant(s)	Controlling Emissions for Unit Number(s) <sup>1</sup>	Efficiency (% Control by Weight)	Method used to Estimate Efficiency					
<sup>1</sup> List each control device on a separate line. For each control device, list all emission units controlled by the control device.											

#### Table 2-D: Maximum Emissions (under normal operating conditions)

#### This Table was intentionally left blank because it would be identical to Table 2-E.

Maximum Emissions are the emissions at maximum capacity and prior to (in the absence of) pollution control, emission-reducing process equipment, or any other emission reduction. Calculate the hourly emissions using the worst case hourly emissions for each pollutant. For each pollutant, calculate the annual emissions as if the facility were operating at maximum plant capacity without pollution controls for 8760 hours per year, unless otherwise approved by the Department. List Hazardous Air Pollutants (HAP) & Toxic Air Pollutants (TAPs) in Table 2-I. Unit & stack numbering must be consistent throughout the application package. Fill all cells in this table with the emission numbers or a "." symbol. A "." symbol indicates that emissions of this pollutant are not expected. Numbers shall be expressed to at least 2 decimal points (c.g. 0.41, 1.41, or 1.41E-4).

Unit No.	N	Ox	C	20	VC	DC	S	Ox	P	M1	PN	110 <sup>1</sup>	PM	2.5 <sup>1</sup>	Н	$_2$ S	Le	ead
Unit No.	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
VLL1EG-1	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-2	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-3	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-4	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-5	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-6	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-7	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-8	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-9	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-10	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-11	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-12	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-1R	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-2R	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-1	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-2	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-3	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-4	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-5	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-6	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-7	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-8	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-9	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-10	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-11	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-12 VLL2EG-1R	81.01	20.25	12.63	3.16	4.01 4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-IR VLL2EG-2R	81.01	20.25 20.25	12.63 12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-2R VLL3EG-1	81.01		3.99	3.16	4.01		0.04	0.01	1.39	0.65				0.65				
	64.56	16.14 16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39 1.39	0.35	1.39 1.39	0.35				
VLL3EG-2 VLL3EG-3	64.56 64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-3 VLL3EG-4	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-4 VLL3EG-5	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-6	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-6 VLL3EG-7	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-7 VLL3EG-8	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-8 VLL3EG-9	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-10	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-10 VLL3EG-11	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-11 VLL3EG-12	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-12 VLL3EG-1R	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-1R VLL3EG-2R	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL4EG-1	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL4EG-1 VLL5EG-1	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-2	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-3	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-4	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-5	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-6	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VELSEG-0	0.40	1.01	5.77	1.00	1.47	0.57	0.04	0.01	1.37	0.55	1.37	0.55	1.37	0.55				

	N	Ox	6	0	V	)C	¢.	Ox	n	M1	ры	110 <sup>1</sup>	PM	2.51	п	I,S	L	ead
Unit No.	lb/hr	ton/vr	lb/hr	ton/yr	lb/hr	ton/vr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	2.5 ton/yr	lb/hr	ton/yr	lb/hr	ton/vr
VILLEC 7		v	3.99	1.00		0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	e e e e e e e e e e e e e e e e e e e		· ·		
VLL5EG-7	6.46	1.61			1.49									0.35				
VLL5EG-8	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-9	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-10	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-11	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-12	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-1R	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-2R	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-1	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-2	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-3	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-4	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-5	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-6	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-7	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-8	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-9	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-9 VLL6EG-10	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39					
														0.35				
VLL6EG-11	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-12	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-1R	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-2R	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL1EG-N1	71.88	17.97	11.54	2.88	2.72	0.68	0.03	0.01	3.26	0.81	3.26	0.81	3.26	0.81				
VLL1EG-N2	71.88	17.97	11.54	2.88	2.72	0.68	0.03	0.01	3.26	0.81	3.26	0.81	3.26	0.81				
VLL1EG-1-N1	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.46	0.36	1.46	0.36	1.46	0.36				
VLL1EG-1-N2	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.46	0.36	1.46	0.36	1.46	0.36				
VLL1EG-1-N3	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.46	0.36	1.46	0.36	1.46	0.36				
VLL1EG-1-N4	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.46	0.36	1.46	0.36	1.46	0.36				
VLL2EG-N1	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-N2	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-N3	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-N4	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL3EG-N1	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-N2	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-N3	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-N4	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-N1	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-N2	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-N3	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-N4	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-N1	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-N2	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-N3	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-N4	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL1EG-A1	16.78	4.19	4.31	1.08	0.39	0.10	0.01	0.00	0.97	0.24	0.97	0.24	0.97	0.24				
VCN1EG-A1	16.78	4.19	4.31	1.08	0.39	0.10	0.01	0.00	0.97	0.24	0.97	0.24	0.97	0.24				
VCN1EG-N1	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN1EG-N2	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN1EG-N3	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN1EG-N4	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
			3.99	1.00						0.35	1.39	0.35						
VCN2EG-N1	6.46	1.61			1.49	0.37	0.04	0.01	1.39				1.39	0.35				
VCN2EG-N2	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN2EG-N3	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN2EG-N4	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN3EG-N1	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN3EG-N2	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				

	N	Ov	-	20	174	DC	C.	Ox	ъ	M1	ра	110 <sup>1</sup>	ръ	2.5 <sup>1</sup>	п	[ <sub>1</sub> S	L	ead
Unit No.	lb/hr		-					-		T						Ť		
VONDEC ND		ton/yr	lb/hr	ton/yr 1.00	lb/hr	ton/yr 0.37	1b/hr 0.04	ton/yr 0.01	lb/hr	0.35	1.39	ton/yr 0.35	1.39	ton/yr 0.35	lb/hr	ton/yr	lb/hr	ton/yr
VCN3EG-N3	6.46	1.61	3.99		1.49				1.39						-			
VCN3EG-N4	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN4EG-1	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN5EG-N1	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN5EG-N2	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN5EG-N3	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN5EG-N4	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN6EG-N1	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN6EG-N2	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN6EG-N3	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN6EG-N4	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN-EG-DCBX	6.37	1.59	12.04	3.01	0.61	0.15	0.03	0.01	2.18	0.55	2.18	0.55	2.18	0.55				
VCN-EG-DCBY	6.37	1.59	12.04	3.01	0.61	0.15	0.03	0.01	2.18	0.55	2.18	0.55	2.18	0.55				
TMP-1	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD				
TMP-2	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD				
VLL1DBT-1					0.01	0.00									-			
VLL1DBT-2					0.01	0.00												
VLL1DBT-3					0.01	0.00									-			
VLL1DBT-4					0.01	0.00									-			
VLL1DBT-5					0.01	0.00												
VLL1DBT-6					0.01	0.00												
VLL1DBT-7					0.01	0.00												
VLL1DBT-8					0.01	0.00												
VLL1DBT-9					0.01	0.00												
VLL1DBT-10					0.01	0.00												
VLL1DBT-11					0.01	0.00												
VLL1DBT-12					0.01	0.00												
VLL1DBT-1R					0.01	0.00												
VLL1DBT-2R					0.01	0.00												
VLL2DBT-1					0.01	0.00												
VLL2DBT-2					0.01	0.00												
VLL2DBT-3					0.01	0.00												
VLL2DBT-4					0.01	0.00												
VLL2DBT-5						0.00												
					0.01													
VLL2DBT-6					0.01	0.00												
VLL2DBT-7					0.01	0.00												
VLL2DBT-8					0.01	0.00												
VLL2DBT-9					0.01	0.00												
VLL2DBT-10					0.01	0.00												
VLL2DBT-11					0.01	0.00												
VLL2DBT-12					0.01	0.00												
VLL2DBT-1R	-				0.01	0.00				-			-					
VLL2DBT-2R					0.01	0.00												
VLL3DBT-1					0.02	0.00												
VLL3DBT-2					0.02	0.00												
VLL3DBT-3					0.02	0.00												
VLL3DBT-4					0.02	0.00												
VLL3DBT-5					0.02	0.00												
VLL3DBT-6					0.02	0.00												
VLL3DBT-7					0.02	0.00												
						0.00												
VLL3DBT-8					0.02													
VLL3DBT-9					0.02	0.00												
VLL3DBT-10					0.02	0.00												
VLL3DBT-11					0.02	0.00												
VLL3DBT-12					0.02	0.00												
VLL3DBT-1R					0.02	0.00												

	N	Ox	(	20	VC	)C	SC	)x	Р	M1	PN	<b>110<sup>1</sup></b>	PM	2.5 <sup>1</sup>	Н	<sub>2</sub> S	Le	ad
Unit No.	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr										
VLL3DBT-2R					0.02	0.00												
VLL4DBT-1	-				0.02	0.00												
VLL5DBT-1					0.02	0.00	-		-		-						-	
VLL5DBT-2					0.02	0.00												
VLL5DBT-3					0.02	0.00												
VLL5DBT-4					0.02	0.00												
VLL5DBT-5					0.02	0.00												
VLL5DBT-6					0.02	0.00												
VLL5DBT-7					0.02	0.00												
VLL5DBT-8					0.02	0.00												
VLL5DBT-9					0.02	0.00					-							
VLL5DBT-10					0.02	0.00												
VLL5DBT-11 VLL5DBT-12					0.02	0.00												
VLL5DBT-12 VLL5DBT-1R					0.02	0.00												
VLL5DBT-1R VLL5DBT-2R					0.02	0.00												
VLL5DB1-2R VLL6DBT-1					0.02	0.00												
VLL6DBT-2					0.02	0.00												
VLL6DBT-3					0.02	0.00												
VLL6DBT-4					0.02	0.00												
VLL6DBT-5					0.02	0.00												
VLL6DBT-6					0.02	0.00												
VLL6DBT-7					0.02	0.00												
VLL6DBT-8					0.02	0.00												
VLL6DBT-9					0.02	0.00												
VLL6DBT-10					0.02	0.00												
VLL6DBT-11					0.02	0.00			-									
VLL6DBT-12	-				0.02	0.00												
VLL6DBT-1R					0.02	0.00												
VLL6DBT-2R					0.02	0.00												
VLL1DBT-N1					0.01	0.00												
VLL1DBT-N2					0.01	0.00			-		-							
VLL1DBT-1-N1					0.02	0.00					-							
VLL1DBT-1-N2					0.02	0.00												
VLL1DBT-1-N3					0.02	0.00												
VLL1DBT-1-N4					0.02	0.00												
VLL2DBT-N1					0.01	0.00												
VLL2DBT-N2					0.01	0.00												
VLL2DBT-N3 VLL2DBT-N4					0.01	0.00												
VLL2DB1-N4 VLL3DBT-N1					0.01	0.00												
VLL3DB1-N1 VLL3DBT-N2					0.02	0.00												
VLL3DBT-N2 VLL3DBT-N3					0.02	0.00												
VLL3DBT-N3					0.02	0.00												
VLL5DBT-N1					0.02	0.00												
VLL5DBT-N2					0.02	0.00												
VLL5DBT-N3					0.02	0.00												
VLL5DBT-N3					0.02	0.00												
VLL6DBT-N1 VLL6DBT-N2					0.02	0.00												
-					0.02	0.00												
VLL6DBT-N3					0.02	0.00												
VLL6DBT-N4					0.02	0.00												
VCN1DBT-N1					0.02	0.00												
VCN1DBT-N2					0.02	0.00												
VCN1DBT-N3					0.02	0.00												

Greater Kudu LLC

II '' N	N	Ox	C	0	VO	)C	S	Ox	PI	M1	PN	110 <sup>1</sup>	PM	2.5 <sup>1</sup>	Н	$_2S$	L	ead
Unit No.	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
VCN1DBT-N4					0.02	0.00												
VCN2DBT-N1					0.01	0.00												
VCN2DBT-N2					0.01	0.00												
VCN2DBT-N3					0.01	0.00												
VCN2DBT-N4					0.01	0.00												
VCN3DBT-N1					0.02	0.00												
VCN3DBT-N2			-		0.02	0.00	-											
VCN3DBT-N3					0.02	0.00												
VCN3DBT-N4			-		0.02	0.00	-											
VCN5DBT-N1					0.02	0.00												
VCN5DBT-N2					0.02	0.00												
VCN5DBT-N3					0.02	0.00												
VCN5DBT-N4					0.02	0.00												
VCN6DBT-N1					0.02	0.00												
VCN6DBT-N2					0.02	0.00												
VCN6DBT-N3					0.02	0.00												
VCN6DBT-N4					0.02	0.00												
VCN-DBT- DCBX					0.01	0.00												
VCN-DBT- DCBY					0.01	0.00			-									
VCN4DBT-1					0.02	0.00												
VLL1DBT-A1					0.01	0.00	-											
VCN1DBT-A1					0.01	0.00												
Totals	4635.09	1158.77	779.11	194.78	256.69	64.17	5.00	1.25	207.45	51.86	207.45	51.86	207.45	51.86				

Greater Kudu LLC

<sup>1</sup>Condensable Particulate Matter: Include condensable particulate matter emissions for PM10 and PM2.5 if the source is a combustion source. Do not include condensable particulate matter for PM unless PM is set equal to PM10 and PM2.5. Particulate matter (PM) is not subject to an ambient air quality standard, but PM is a regulated air pollutant under PSD (20.2.74 NMAC) and Title V (20.2.70 NMAC).

#### Table 2-E: Requested Allowable Emissions

Unit & stack numbering must be consistent throughout the application package. Fill all cells in this table with the emission numbers or a "-" symbol. A "-" symbol indicates that emissions of this pollutant are not expected. Numbers shall be expressed to at least 2 decimal pc (e.g. 0.41, 1.41, or 1.41E<sup>4</sup>).

Unit No.	NO	)x <sup>1</sup>	C	20	VO	DC	S	Ox	P	M <sup>2</sup>	PM	110 <sup>2</sup>	PM	12.5 <sup>2</sup>	Н	$_2S$	Le	ad
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
VLL1EG-1	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-2	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-3	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-4	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-5	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-6	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-7	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-8	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-9	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-10	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-11	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-12	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-1R	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL1EG-2R	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-1	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-2	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-3	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-4	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-5	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-6	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-7	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-8	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-9	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-10	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-11	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-12	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-1R	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-2R	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL3EG-1	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-2	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-3	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-4	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-5	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-5 VLL3EG-6	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-6 VLL3EG-7	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-7 VLL3EG-8	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-8 VLL3EG-9	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-9 VLL3EG-10	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-10 VLL3EG-11	64.56		3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-11 VLL3EG-12	64.56 64.56	16.14 16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-1R																		
VLL3EG-2R	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL4EG-1	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-1	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-2	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-3	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-4	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-5	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-6	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-7	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-8	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-9	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-10	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				

	NO	)x <sup>1</sup>	C	20	V	)C	S	Ox	Р	M <sup>2</sup>	PN	110 <sup>2</sup>	PM	12.5 <sup>2</sup>	Н	I <sub>2</sub> S	L	ead
Unit No.	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
VLL5EG-11	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-12	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-1R	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-2R	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-1	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-2	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-3	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-4	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-5	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-6	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-7	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-8	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-9	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-10	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-11	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-12	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-1R	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-2R	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL1EG-N1	71.88	17.97	11.54	2.88	2.72	0.68	0.03	0.01	3.26	0.81	3.26	0.81	3.26	0.81				
VLL1EG-N2	71.88	17.97	11.54	2.88	2.72	0.68	0.03	0.01	3.26	0.81	3.26	0.81	3.26	0.81				
VLL1EG-1-N1	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.46	0.36	1.46	0.36	1.46	0.36				
VLL1EG-1-N2	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.46	0.36	1.46	0.36	1.46	0.36				
VLL1EG-1-N3	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.46	0.36	1.46	0.36	1.46	0.36				
VLL1EG-1-N4	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.46	0.36	1.46	0.36	1.46	0.36				
VLL2EG-N1	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-N2	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-N3	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL2EG-N4	81.01	20.25	12.63	3.16	4.01	1.00	0.04	0.01	2.60	0.65	2.60	0.65	2.60	0.65				
VLL3EG-N1	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-N2	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-N3	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL3EG-N4	64.56	16.14	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-N1	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-N2	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-N3	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL5EG-N4	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-N1	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-N2	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-N3	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL6EG-N4	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VLL1EG-A1	16.78	4.19	4.31	1.08	0.39	0.10	0.04	0.00	0.97	0.24	0.97	0.24	0.97	0.24				
VCN1EG-A1	16.78	4.19	4.31	1.08	0.39	0.10	0.01	0.00	0.97	0.24	0.97	0.24	0.97	0.24				
VCNIEG-N1	6.46	1.61	3.99	1.00	1.49	0.37	0.01	0.00	1.39	0.35	1.39	0.35	1.39	0.35				
VCN1EG-N2	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN1EG-N2	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN1EG-N4	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN2EG-N1	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN2EG-N1	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN2EG-N2	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN2EG-N3	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN2EG-N4 VCN3EG-N1	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN3EG-N1 VCN3EG-N2	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
1	6.46		3.99	1.00	1.49	0.37	0.04		1.39	0.35		0.35	1.39	0.35				
VCN3EG-N3		1.61						0.01			1.39							
VCN3EG-N4	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN4EG-1	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN5EG-N1	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN5EG-N2	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				

Table 2-E: Page 2

r	N	21		0	vo	)C	5	Ox		<b>s</b> <sup>2</sup>	DN	1.02		10 c <sup>2</sup>	. u	<sub>2</sub> S	I I.	ead
Unit No.	lb/hr	Ox <sup>1</sup> ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	M <sup>2</sup> ton/yr	lb/hr	10 <sup>2</sup> ton/yr	lb/hr	12.5 <sup>2</sup> ton/yr	lb/hr	25 ton/yr	lb/hr	ton/yr
VCN5EG-N3	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN5EG-N4	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN6EG-N1	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN6EG-N2	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN6EG-N3	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN6EG-N4	6.46	1.61	3.99	1.00	1.49	0.37	0.04	0.01	1.39	0.35	1.39	0.35	1.39	0.35				
VCN-EG-DCBX	6.37	1.59	12.04	3.01	0.61	0.15	0.03	0.01	2.18	0.55	2.18	0.55	2.18	0.55				
VCN-EG-DCBY	6.37	1.59	12.04	3.01	0.61	0.15	0.03	0.01	2.18	0.55	2.18	0.55	2.18	0.55				
TMP-1	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD				
TMP-2	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD				
VLL1DBT-1					0.01	0.00												
VLL1DBT-2					0.01	0.00												
VLL1DBT-3					0.01	0.00												
VLL1DBT-4					0.01	0.00												
VLL1DBT-5					0.01	0.00												
VLL1DBT-6					0.01	0.00												
VLL1DBT-7					0.01	0.00												
VLL1DBT-8					0.01	0.00												
VLL1DBT-9					0.01	0.00												
VLL1DBT-10					0.01	0.00												
VLL1DBT-11					0.01	0.00												
VLL1DBT-12					0.01	0.00												
VLL1DBT-1R					0.01	0.00												
VLL1DBT-2R					0.01	0.00												
VLL2DBT-1					0.01	0.00												
VLL2DBT-2					0.01	0.00												
VLL2DBT-3					0.01	0.00												
VLL2DBT-4					0.01	0.00												
VLL2DBT-5					0.01	0.00												
VLL2DBT-6					0.01	0.00												
VLL2DBT-7					0.01	0.00												
VLL2DBT-8					0.01	0.00												
VLL2DBT-9					0.01	0.00												
VLL2DBT-10					0.01	0.00												
VLL2DBT-11					0.01	0.00												
VLL2DBT-12					0.01	0.00												
VLL2DBT-1R					0.01	0.00												
VLL2DBT-2R					0.01	0.00												
VLL3DBT-1					0.02	0.00												
VLL3DBT-2					0.02	0.00												
VLL3DBT-3					0.02	0.00												
VLL3DBT-4					0.02	0.00												
VLL3DBT-5					0.02	0.00												
VLL3DBT-6					0.02	0.00												
VLL3DBT-7					0.02	0.00												
VLL3DBT-8					0.02	0.00												
VLL3DBT-9					0.02	0.00												
VLL3DBT-10					0.02	0.00												
VLL3DBT-11					0.02	0.00												
VLL3DBT-12					0.02	0.00												
VLL3DBT-1R					0.02	0.00												
VLL3DBT-2R					0.02	0.00												
VLL4DBT-1					0.02	0.00												
VLL5DBT-1					0.02	0.00												
VLL5DBT-2					0.02	0.00												
VLL5DBT-3					0.02	0.00												
VLL5DBT-4					0.02	0.00												
VLLJDD1-4					0.02	0.00								-				

	N	Dx <sup>1</sup>	0	20	V	DC	S	Ox	Р	M <sup>2</sup>	PM	(10 <sup>2</sup>	PM	2.5 <sup>2</sup>	Н	2S	L	ead
Unit No.	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
VLL5DBT-5					0.02	0.00			-	-			-				-	
VLL5DBT-6					0.02	0.00												
VLL5DBT-7					0.02	0.00												
VLL5DBT-8					0.02	0.00												
VLL5DBT-9					0.02	0.00												
VLL5DBT-10					0.02	0.00												
VLL5DBT-11					0.02	0.00												
VLL5DBT-12					0.02	0.00												
VLL5DBT-1R					0.02	0.00												
VLL5DBT-2R					0.02	0.00												
VLL6DBT-1					0.02	0.00												
VLL6DBT-2					0.02	0.00												
					0.02	0.00												
VLL6DBT-3																		
VLL6DBT-4					0.02	0.00												
VLL6DBT-5					0.02	0.00												
VLL6DBT-6					0.02	0.00												
VLL6DBT-7					0.02	0.00												
VLL6DBT-8					0.02	0.00												
VLL6DBT-9					0.02	0.00												
VLL6DBT-10					0.02	0.00												
VLL6DBT-11					0.02	0.00												
VLL6DBT-12					0.02	0.00												
VLL6DBT-1R					0.02	0.00												
VLL6DBT-2R					0.02	0.00												
VLL1DBT-N1					0.01	0.00												
VLL1DBT-N2					0.01	0.00												
VLL1DBT-1-N1					0.02	0.00								-				
VLL1DBT-1-N2					0.02	0.00												
VLL1DBT-1-N3					0.02	0.00												
VLL1DBT-1-N4					0.02	0.00												
VLL2DBT-N1					0.01	0.00												
VLL2DBT-N2					0.01	0.00												
VLL2DBT-N3					0.01	0.00												
VLL2DBT-N4					0.01	0.00												
VLL3DBT-N1					0.02	0.00												
VLL3DBT-N2					0.02	0.00												
VLL3DBT-N3					0.02	0.00												
VLL3DBT-N3 VLL3DBT-N4					0.02	0.00												
VLL5DBT-N4 VLL5DBT-N1					0.02	0.00												
VLL5DBT-N2 VLL5DBT-N3					0.02	0.00												
						0.00												
VLL5DBT-N4					0.02													
VLL6DBT-N1					0.02	0.00												
VLL6DBT-N2					0.02	0.00												
VLL6DBT-N3					0.02	0.00												
VLL6DBT-N4					0.02	0.00												
VCN1DBT-N1					0.02	0.00												
VCN1DBT-N2					0.02	0.00												
VCN1DBT-N3					0.02	0.00			-				-				-	
VCN1DBT-N4					0.02	0.00												
VCN2DBT-N1					0.01	0.00								-				
VCN2DBT-N2					0.01	0.00												
VCN2DBT-N3					0.01	0.00												
VCN2DBT-N4					0.01	0.00												
VCN3DBT-N1					0.02	0.00												
ACTODD I-INT					0.02	0.00					I	I			I	I		

Unit No.	N	)x <sup>1</sup>	C	0	VC	C	S	Ox	PI	$M^2$	PM	110 <sup>2</sup>	PM	12.5 <sup>2</sup>	Н	$_2S$	Le	ead
Unit No.	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
VCN3DBT-N2					0.02	0.00												
VCN3DBT-N3					0.02	0.00			1									
VCN3DBT-N4					0.02	0.00												
VCN5DBT-N1					0.02	0.00			-	-			-	-		-		
VCN5DBT-N2					0.02	0.00												
VCN5DBT-N3					0.02	0.00												
VCN5DBT-N4					0.02	0.00												
VCN6DBT-N1					0.02	0.00												
VCN6DBT-N2					0.02	0.00												
VCN6DBT-N3					0.02	0.00												
VCN6DBT-N4					0.02	0.00												
VCN-DBT-DCBX					0.01	0.00												
VCN-DBT-DCBY					0.01	0.00												
VCN4DBT-1					0.02	0.00												
VLL1DBT-A1					0.01	0.00												
VCN1DBT-A1					0.01	0.00												
Totals		99.90		99.90		22.37												

<sup>1</sup>NO<sub>X</sub> emissions listed in this table represent maximum controlled emissions for the generators equipped with SCR (all VLL5, VLL6, and VCN engines, excluding the VCN admin generators).

<sup>2</sup> Condensable Particulate Matter: Include condensable particulate matter (PM) is not subject to an ambient air quality standard, but it is a regulated air pollutant under PSD (20.2.74 NMAC) and Title V (20.2.70 NMAC).

NOTE: The maximum allowable annual emissions for each emergency generator are based on a maximum of 500 hours of operation per generator. The site-wide allowable emission Equals) are based on the requested Title V synthetic minor limitations for the site. As discussed in Section 2.1 of the application report, the applicant will conduct monthly NQ and CO emissions tracking in order to ensure compliance with the requested site-wide allowable emission limits.

### Table 2-J: Fuel

Specify fuel characteristics and usage. Unit and stack numbering must correspond throughout the application package.

	Fuel Type (low sulfur Diesel,	Fuel Source: purchased commercial,		Speci	fy Units		
Unit No.	ultra low sulfur diesel, Natural Gas, Coal,)	pipeline quality natural gas, residue gas, raw/field natural gas, process gas (e.g. SRU tail gas) or other	Lower Heating Value	Hourly Usage	Annual Usage	% Sulfur	% Ash
VLL1EG-1	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL1EG-2	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL1EG-3	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL1EG-4	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL1EG-5	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL1EG-6	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL1EG-7	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL1EG-8	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL1EG-9	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL1EG-10	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL1EG-11	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL1EG-12	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL1EG-1R	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL1EG-2R	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL2EG-1	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL2EG-2	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL2EG-3	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL2EG-4	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA

	Fuel Type (low sulfur Diesel,	Fuel Source: purchased commercial,		Speci	fy Units		
Unit No.	ultra low sulfur diesel, Natural Gas, Coal,)	pipeline quality natural gas, residue gas, raw/field natural gas, process gas (e.g. SRU tail gas) or other	Lower Heating Value	Hourly Usage	Annual Usage	% Sulfur	% Ash
VLL2EG-5	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL2EG-6	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL2EG-7	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL2EG-8	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL2EG-9	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL2EG-10	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL2EG-11	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL2EG-12	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL2EG-1R	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL2EG-2R	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL3EG-1	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL3EG-2	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL3EG-3	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL3EG-4	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL3EG-5	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL3EG-6	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL3EG-7	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL3EG-8	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL3EG-9	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA

	Fuel Type (low sulfur Diesel,	Fuel Source: purchased commercial,		Speci	fy Units		
Unit No.	ultra low sulfur diesel, Natural Gas, Coal,)	pipeline quality natural gas, residue gas, raw/field natural gas, process gas (e.g. SRU tail gas) or other	Lower Heating Value	Hourly Usage	Annual Usage	% Sulfur	% Ash
VLL3EG-10	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL3EG-11	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL3EG-12	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL3EG-1R	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL3EG-2R	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL4EG-1	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL5EG-1	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL5EG-2	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL5EG-3	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL5EG-4	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL5EG-5	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL5EG-6	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL5EG-7	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL5EG-8	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL5EG-9	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL5EG-10	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL5EG-11	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL5EG-12	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA
VLL5EG-1R	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA

	Fuel Type (low sulfur Diesel,	Fuel Source: purchased commercial,	Specify Units								
Unit No.	ultra low sulfur diesel, Natural Gas, Coal,)	pipeline quality natural gas, residue gas, raw/field natural gas, process gas (e.g. SRU tail gas) or other	Lower Heating Value	Hourly Usage	Annual Usage	% Sulfur	% Ash				
VLL5EG-2R	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL6EG-1	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL6EG-2	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL6EG-3	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL6EG-4	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL6EG-5	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL6EG-6	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL6EG-7	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL6EG-8	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL6EG-9	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL6EG-10	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL6EG-11	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL6EG-12	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL6EG-1R	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL6EG-2R	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL1EG-N1	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL1EG-N2	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN-EG-DCBX	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN-EG-DCBY	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				

	Fuel Type (low sulfur Diesel,	Fuel Source: purchased commercial,	Specify Units								
Unit No.	ultra low sulfur diesel, Natural Gas, Coal,)	pipeline quality natural gas, residue gas, raw/field natural gas, process gas (e.g. SRU tail gas) or other	Lower Heating Value	Hourly Usage	Annual Usage	% Sulfur	% Ash				
VLL1EG-1-N1	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL1EG-1-N2	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL1EG-1-N3	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL1EG-1-N4	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL2EG-N1	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL2EG-N2	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL2EG-N3	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL2EG-N4	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL3EG-N1	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL3EG-N2	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL3EG-N3	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL3EG-N4	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL5EG-N1	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL5EG-N2	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL5EG-N3	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL5EG-N4	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL6EG-N1	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL6EG-N2	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL6EG-N3	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				

	Fuel Type (low sulfur Diesel,	Fuel Source: purchased commercial,	Specify Units								
Unit No.	ultra low sulfur diesel, Natural Gas, Coal,)	pipeline quality natural gas, residue gas, raw/field natural gas, process gas (e.g. SRU tail gas) or other	Lower Heating Value	Hourly Usage	Annual Usage	% Sulfur	% Ash				
VLL6EG-N4	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VLL1EG-A1	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN1EG-A1	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN1EG-N1	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN1EG-N2	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN1EG-N3	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN1EG-N4	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN2EG-N1	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN2EG-N2	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN2EG-N3	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN2EG-N4	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN3EG-N1	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN3EG-N2	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN3EG-N3	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN3EG-N4	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN4EG-1	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN5EG-N1	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN5EG-N2	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN5EG-N3	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				

Unit No.	Fuel Type (low sulfur Diesel,	Fuel Source: purchased commercial,	Specify Units								
	ultra low sulfur diesel, Natural Gas, Coal,)	pipeline quality natural gas, residue gas, raw/field natural gas, process gas (e.g. SRU tail gas) or other	Lower Heating Value	Hourly Usage	Annual Usage	% Sulfur	% Ash				
VCN5EG-N4	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN6EG-N1	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN6EG-N2	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN6EG-N3	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
VCN6EG-N4	Ultra Low Sulfur Diesel, including Renewable Diesel	Purchased Commercial				0.0015	NA				
TMP-1	Ultra Low Sulfur Diesel	Purchased Commercial				0.0015	NA				
TMP-2	Ultra Low Sulfur Diesel	Purchased Commercial				0.0015	NA				

### Table 2-P:Greenhouse Gas Emissions

Applications submitted under 20.2.70, 20.2.72, & 20.2.74 NMAC are required to complete this Table. Power plants, Title V major sources, and PSD major sources must report and calculate all GHG emissions for each unit. Applicants must report potential emission rates in short tons per year (see Section 6.a for assistance). Include GHG emissions during Startup, Shutdown, and Scheduled Maintenance in this table. For minor source facilities that are not power plants, are not Title V, or are not PSD, there are three options for reporting GHGs 1) report GHGs for each individual piece of equipment; 2) report all GHGs from a group of unit types, for example report all combustion source GHGs as a single unit and all venting GHG as a second separate unit; OR 3) check the following box X By checking this box, the applicant acknowledges the total CO2e emissions are less than 75,000 tons per year.

		CO <sub>2</sub> ton/yr	N2O ton/yr	CH <sub>4</sub> ton/yr	SF <sub>6</sub> ton/yr	PFC/HFC ton/yr <sup>2</sup>					<b>Total</b> <b>GHG</b> Mass Basis ton/yr <sup>4</sup>	<b>Total</b> <b>CO<sub>2</sub>e</b> ton/yr <sup>5</sup>
Unit No.	GWPs <sup>1</sup>	1	298	25	22,800	footnote 3						
	mass GHG											
	CO <sub>2</sub> e											
	mass GHG											
	CO <sub>2</sub> e											
Tatal	mass GHG											
Total	CO <sub>2</sub> e											

<sup>1</sup> GWP (Global Warming Potential): Applicants must use the most current GWPs codified in Table A-1 of 40 CFR part 98. GWPs are subject to change, therefore, applicants need to check 40 CFR 98 to confirm GWP values.

<sup>2</sup> For HFCs or PFCs describe the specific HFC or PFC compound and use a separate column for each individual compound.

<sup>3</sup> For each new compound, enter the appropriate GWP for each HFC or PFC compound from Table A-1 in 40 CFR 98.

<sup>4</sup> Green house gas emissions on a**mass basis** is the ton per year green house gas emission before adjustment with its GWP.

<sup>5</sup> CO<sub>2</sub>e means Carbon Dioxide Equivalent and is calculated by multiplying the TPY mass emissions of the green house gas by its GWP.

## **Application Summary**

The <u>Application Summary</u> 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 affect the facility's operations and emissions, de-bottlenecking impacts, and changes to the facility's major/minor status (both PSD & Title V).

The **Process Summary** shall include a brief description of the facility and its processes.

<u>Startup</u>, <u>Shutdown</u>, <u>and</u> <u>Maintenance</u> (<u>SSM</u>) routine or predictable emissions: 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.

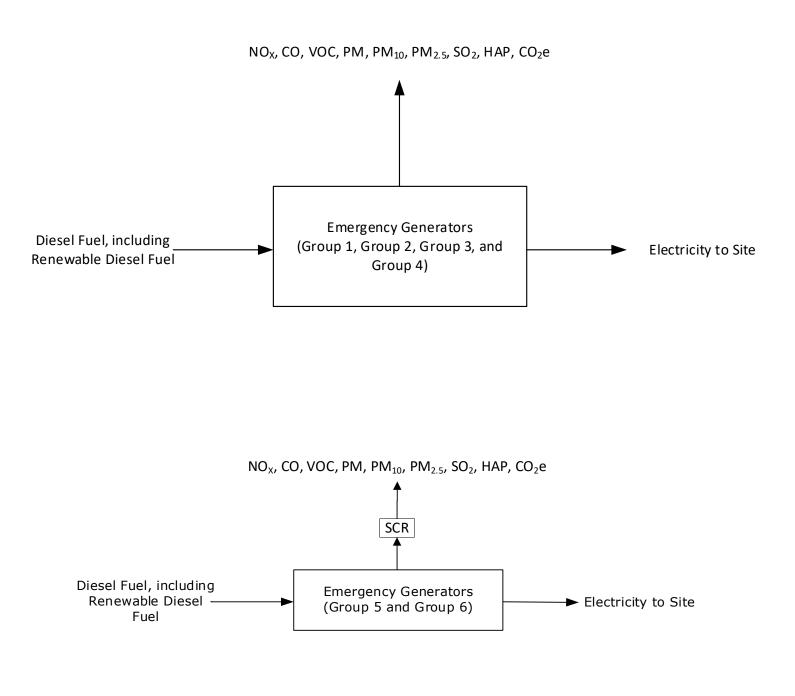
See Sections 1, 2, 3, and 4 of the application report.

Greater Kudu LLC

## **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.



## Plot Plan Drawn to Scale

A <u>plot plan drawn to scale</u> 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.

See Appendix 1.

## **All Calculations**

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

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

**SSM Calculations**: It is the applicant's responsibility to provide an estimate of SSM emissions or to provide justification for not doing so. In this Section, provide emissions calculations for Startup, Shutdown, and Routine Maintenance (SSM) emissions listed in the Section 2 SSM and/or Section 22 GHG Tables and the rational for why the others are reported as zero (or left blank in the SSM/GHG Tables). Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.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.

Form-Section 6 last revised: 5/3/16

**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.

See Section 3 of the application report and Appendices 3 and 6 of the application.

# 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), Minor NSR (20.2.72 NMAC), and PSD (20.2.74 NMAC)** applicants must estimate and report greenhouse gas (GHG) emissions to verify the emission rates reported in the public notice, determine applicability to 40 CFR 60 Subparts, and to evaluate Prevention of Significant Deterioration (PSD) applicability. GHG emissions that are subject to air permit regulations consist of the sum of an aggregate group of these six greenhouse gases: carbon dioxide (CO<sub>2</sub>), nitrous oxide (N<sub>2</sub>O), methane (CH<sub>4</sub>), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>).

### **Calculating GHG Emissions:**

**1.** Calculate the ton per year (tpy) GHG mass emissions and GHG CO<sub>2</sub>e emissions from your facility.

**2.** GHG mass emissions are the sum of the total annual tons of greenhouse gases without adjusting with the global warming potentials (GWPs). GHG CO<sub>2</sub>e 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 <u>Mandatory Greenhouse Gas Reporting</u>.

3. Emissions from routine or predictable start up, shut down, and maintenance must be included.

**4.** Report GHG mass and GHG CO<sub>2</sub>e emissions in Table 2-P of this application. Emissions are reported in <u>short</u> tons per year and represent each emission unit's Potential to Emit (PTE).

**5.** All Title V major sources, PSD major sources, and all power plants, whether major or not, must calculate and report GHG mass and CO2e emissions for each unit in Table 2-P.

**6.** For minor source facilities that are not power plants, are not Title V, and are not PSD there are three options for reporting GHGs in Table 2-P: 1) report GHGs for each individual piece of equipment; 2) report all GHGs from a group of unit types, for example report all combustion source GHGs as a single unit and all venting GHGs as a second separate unit; 3) or check the following  $\square$  By checking this box, the applicant acknowledges the total CO2e emissions are less than 75,000 tons per year.

### 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 <u>Mandatory Green House Gas Reporting</u> 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 CO<sub>2</sub> over a specified time period.

"Greenhouse gas" for the purpose of air permit regulations 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 NMAC, 20.2.74.7 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 <u>Mandatory Greenhouse Reporting</u> requires metric tons.

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

### **Information Used to Determine Emissions**

#### Information Used to Determine Emissions shall include the following:

- ☑ If manufacturer data are used, include specifications for emissions units <u>and</u> 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.

Potential emissions of NO<sub>x</sub>, CO, VOC, filterable PM, PM<sub>10</sub>, and PM<sub>2.5</sub> from the generators were conservatively estimated based on the manufacturer's not to exceed emissions data, or when not to exceed data was not available, from the manufacturer's nominal emissions data with safety factors applied. Emission factors for condensable PM, SO<sub>2</sub>, and HAP are from the USEPA's AP-42, Section 3.4, Large Stationary Diesel And All Stationary Dual-fuel Engines, Tables 3.4-1 and 3.4-3 (October 1996).

See Section 3 of the application report and Appendices 3 and 6 of the application.

	Diesel Fuel (SCC 2-02-004-01)		Dual Fuel <sup>b</sup> (SCC 2-02-004-02)			
Pollutant	Emission Factor (lb/hp-hr) (power output)	Emission Factor (lb/MMBtu) (fuel input)	EMISSION FACTOR RATING	Emission Factor (lb/hp-hr) (power output)	Emission Factor (lb/MMBtu) (fuel input)	EMISSION FACTOR RATING
NO <sub>x</sub>						
Uncontrolled	0.024	3.2	В	0.018	2.7	D
Controlled	0.013 <sup>c</sup>	1.9 <sup>c</sup>	В	ND	ND	NA
СО	5.5 E-03	0.85	С	7.5 E-03	1.16	D
SO <sub>x</sub> <sup>d</sup>	8.09 E-03S <sub>1</sub>	1.01S <sub>1</sub>	В	$\begin{array}{r} 4.06  \text{E-04S}_1 + 9.57 \\ \text{E-03S}_2 \end{array}$	$0.05S_1 + 0.895S_2$	В
$CO_2^e$	1.16	165	В	0.772	110	В
PM	0.0007 <sup>c</sup>	0.1 <sup>c</sup>	В	ND	ND	NA
TOC (as CH <sub>4</sub> )	7.05 E-04	0.09	С	5.29 E-03	0.8	D
Methane	f	f	Е	3.97 E-03	0.6	E
Nonmethane	f	f	E	1.32 E-03	0.2 <sup>g</sup>	E

#### Table 3.4-1. GASEOUS EMISSION FACTORS FOR LARGE STATIONARY DIESEL AND ALL STATIONARY DUAL-FUEL ENGINES<sup>a</sup>

<sup>a</sup> Based on uncontrolled levels for each fuel, from References 2,6-7. When necessary, the average heating value of diesel was assumed to be 19,300 Btu/lb with a density of 7.1 lb/gallon. The power output and fuel input values were averaged independently from each other, because of the use of actual brake-specific fuel consumption (BSFC) values for each data point and of the use of data possibly sufficient to calculate only 1 of the 2 emission factors (e. g., enough information to calculate lb/MMBtu, but not lb/hp-hr). Factors are based on averages across all manufacturers and duty cycles. The actual emissions from a particular engine or manufacturer could vary considerably from these levels. To convert from lb/hp-hr to kg/kw-hr, multiply by 0.608. To convert from lb/MMBtu to ng/J, multiply by 430. SCC = Source Classification Code.

- с
- Dual fuel assumes 95% natural gas and 5% diesel fuel. References 8-26. Controlled NO<sub>x</sub> is by ignition timing retard. Assumes that all sulfur in the fuel is converted to SO<sub>2</sub>.  $S_1 = \%$  sulfur in fuel oil;  $S_2 = \%$  sulfur in natural gas. For example, if sulfer d content is 1.5%, then S = 1.5.
- <sup>e</sup> Assumes 100% conversion of carbon in fuel to CO<sub>2</sub> with 87 weight % carbon in diesel, 70 weight % carbon in natural gas, dual-fuel mixture of 5% diesel with 95% natural gas, average BSFC of 7,000 Btu/hp-hr, diesel heating value of 19,300 Btu/lb, and natural gas heating value of 1050 Btu/scf.
- Based on data from 1 engine, TOC is by weight 9% methane and 91% nonmethane.
- <sup>g</sup> Assumes that nonmethane organic compounds are 25% of TOC emissions from dual-fuel engines. Molecular weight of nonmethane gas stream is assumed to be that of methane.

#### Table 3.4-3. SPECIATED ORGANIC COMPOUND EMISSION FACTORS FOR LARGE UNCONTROLLED STATIONARY DIESEL ENGINES<sup>a</sup>

Pollutant	Emission Factor (lb/MMBtu) (fuel input)
Benzene <sup>b</sup>	7.76 E-04
Toluene <sup>b</sup>	2.81 E-04
Xylenes <sup>b</sup>	1.93 E-04
Propylene	2.79 E-03
Formaldehyde <sup>b</sup>	7.89 E-05
Acetaldehyde <sup>b</sup>	2.52 E-05
Acrolein <sup>b</sup>	7.88 E-06

#### EMISSION FACTOR RATING: E

<sup>a</sup>Based on 1 uncontrolled diesel engine from Reference 7. Source Classification Code 2-02-004-01. Not enough information to calculate the output-specific emission factors of lb/hp-hr. To convert from lb/MMBtu to ng/J, multiply by 430. <sup>b</sup>Hazardous air pollutant listed in the *Clean Air Act*.

#### Table 3.4-4. PAH EMISSION FACTORS FOR LARGE UNCONTROLLED STATIONARY DIESEL ENGINES<sup>a</sup>

#### EMISSION FACTOR RATING: E

РАН	Emission Factor (lb/MMBtu) (fuel input)		
Naphthalene <sup>b</sup>	1.30 E-04		
Acenaphthylene	9.23 E-06		
Acenaphthene	4.68 E-06		
Fluorene	1.28 E-05		
Phenanthrene	4.08 E-05		
Anthracene	1.23 E-06		
Fluoranthene	4.03 E-06		
Pyrene	3.71 E-06		
Benz(a)anthracene	6.22 E-07		
Chrysene	1.53 E-06		
Benzo(b)fluoranthene	1.11 E-06		
Benzo(k)fluoranthene	<2.18 E-07		
Benzo(a)pyrene	<2.57 E-07		
Indeno(1,2,3-cd)pyrene	<4.14 E-07		
Dibenz(a,h)anthracene	<3.46 E-07		
Benzo(g,h,l)perylene	<5.56 E-07		
TOTAL PAH	<2.12 E-04		

<sup>a</sup> Based on 1 uncontrolled diesel engine from Reference 7. Source Classification Code 2-02-004-01. Not enough information to calculate the output-specific emission factors of lb/hp-hr. To convert from lb/MMBtu to ng/J, multiply by 430. <sup>b</sup> Hazardous air pollutant listed in the *Clean Air Act*.

# Section 8

## Map(s)

<u>A map</u> 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	

See Appendix 1.

## **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")

#### X 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.

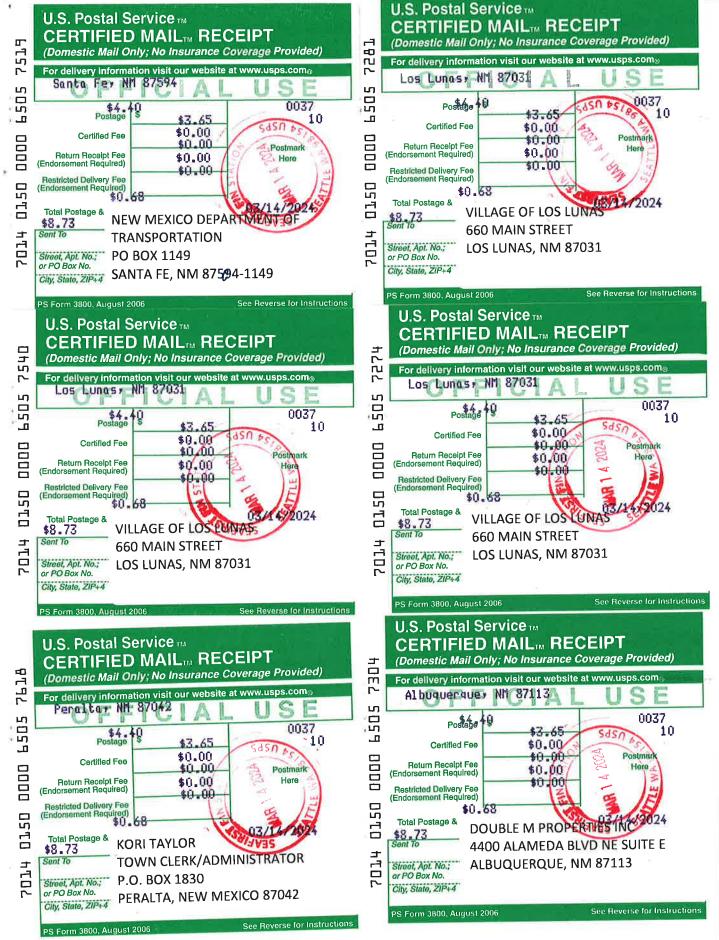
New Permit and Significant Permit Revision public notices must include all items in this list.

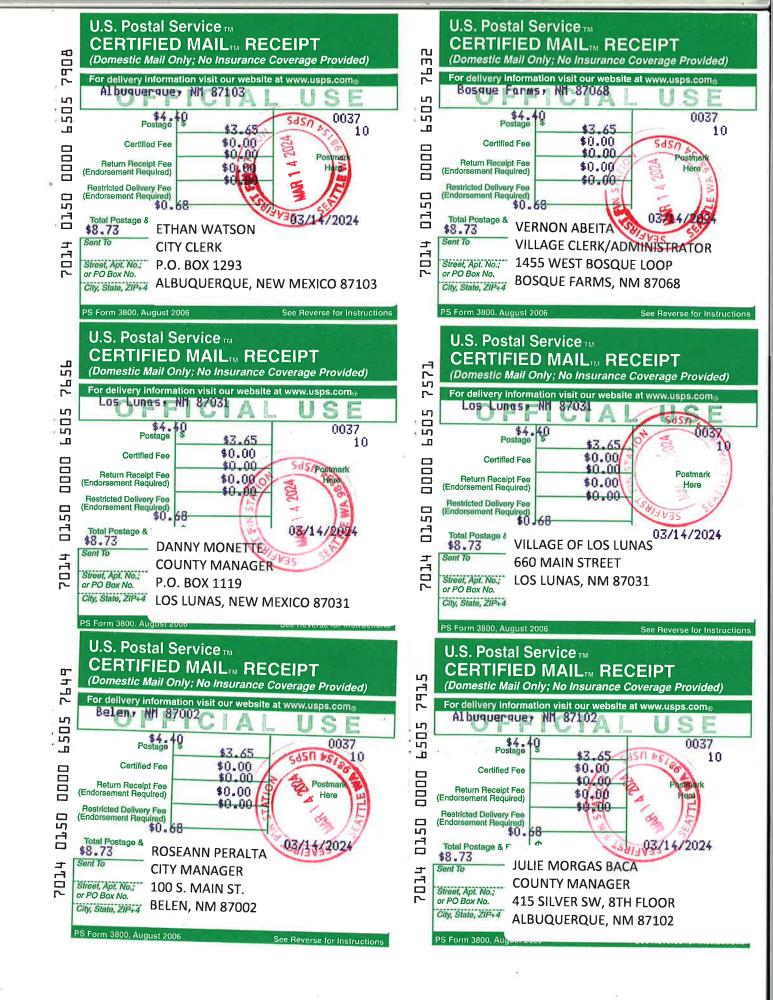
Technical Revision public notices require only items 1, 5, 9, and 10.

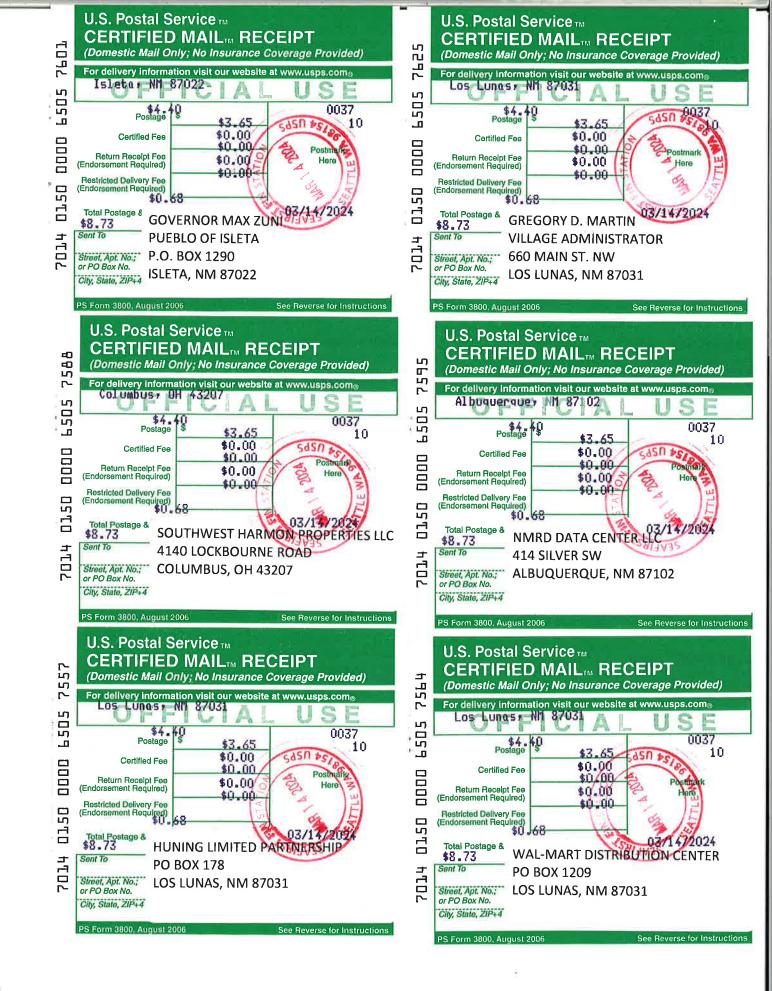
Per the Guidelines for Public Notification document mentioned above, include:

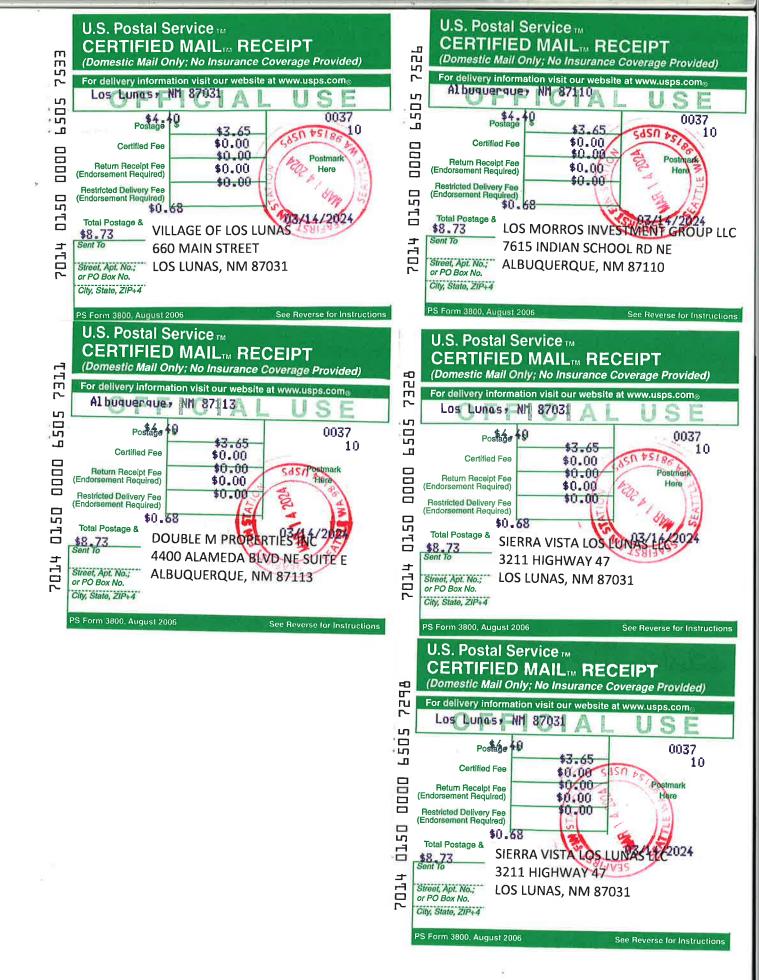
- 1. X A copy of the certified letter receipts with post marks (20.2.72.203.B NMAC)
- 2. X A list of the places where the public notice has been posted in at least four publicly accessible and conspicuous places, including the proposed or existing facility entrance. (e.g: post office, library, grocery, etc.)
- 3. X A copy of the property tax record (20.2.72.203.B NMAC).
- 4. X A sample of the letters sent to the owners of record.
- 5. X A sample of the letters sent to counties, municipalities, and Indian tribes.
- 6. X A sample of the public notice posted and a verification of the local postings.
- 7. X A table of the noticed citizens, counties, municipalities and tribes and to whom the notices were sent in each group.
- 8. X A copy of the public service announcement (PSA) sent to a local radio station and documentary proof of submittal.
- 9. X A copy of the <u>classified or legal</u> 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. X A copy of the <u>display</u> ad including the page heade'r (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. X 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.

Certified Letter Receipts with Postmark



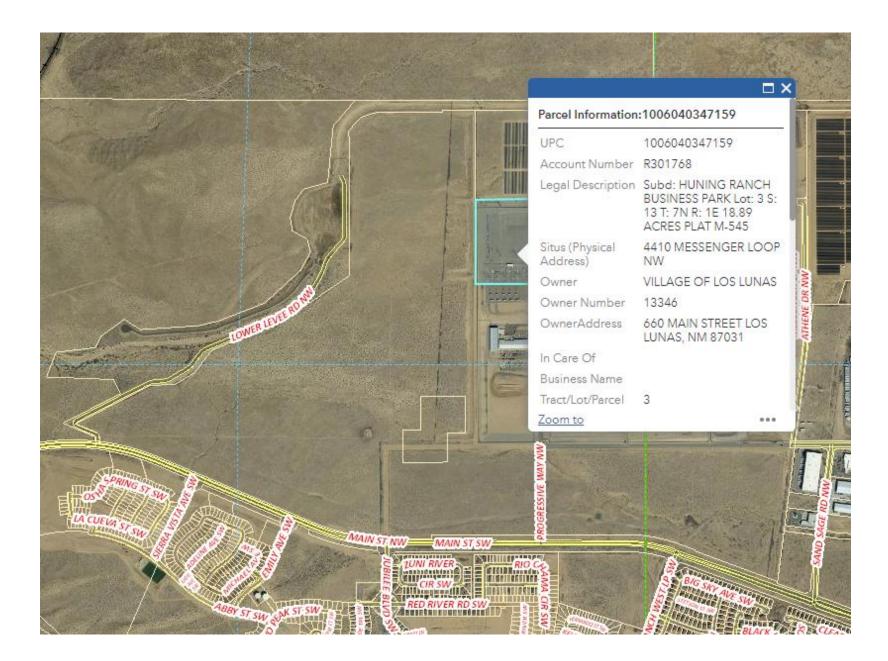






Please see Section 9.6.1 – General Posting of Notices (Public Areas and Facility)

Property Tax Records























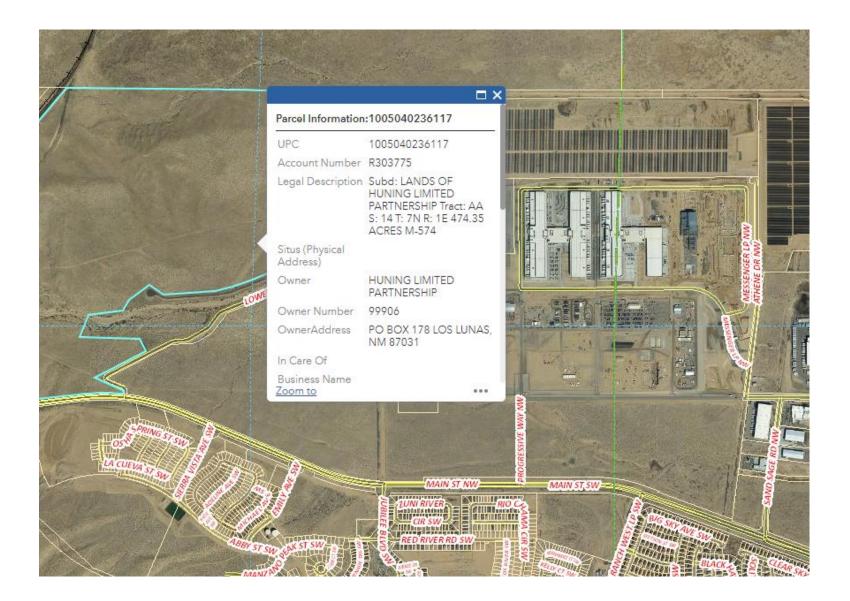


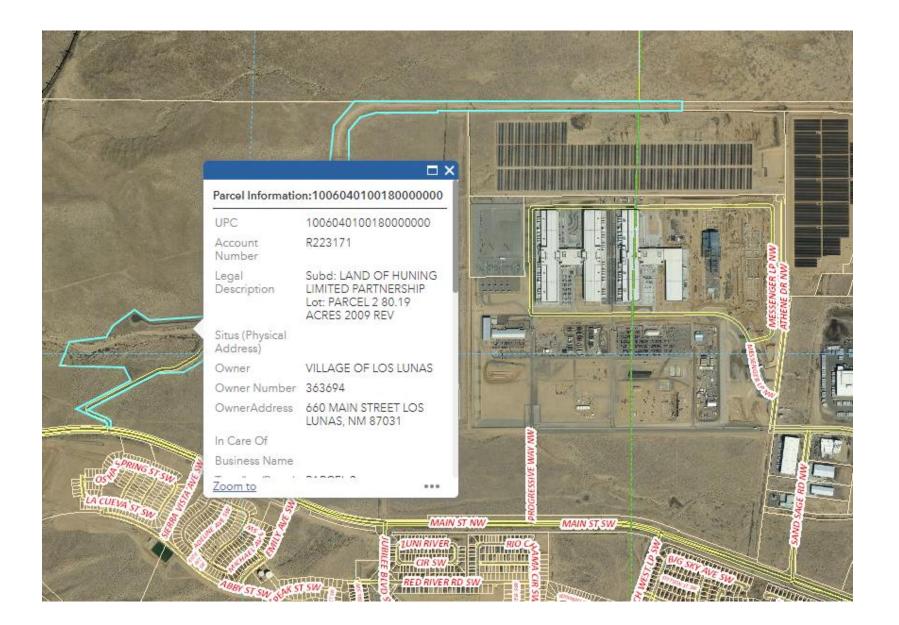












#### Sections 9.4 and 9.5

Sample Letter Sent to Owners of Record, Municipalities, Counties, and Tribal Nations

#### [DATE]

#### <u>CERTIFIED MAIL XXXX XXXX XXXX XXXX</u> <u>RETURN RECEIPT REQUESTED</u>

To Whom It May Concern:

Greater Kudu LLC announces its application submittal to the New Mexico Environment Department for an air quality permit for the modification of its data center facility. The expected date of application submittal to the Air Quality Bureau is March 15, 2024.

The exact location for the proposed facility known as, Greater Kudu LLC, is at latitude 34.82854 dec deg North and longitude -106.78151 dec deg West. The approximate location of this facility is 0.30 miles northwest of the intersection of Los Morros Road and Sandsage Court in Valencia County.

The proposed modification consists of the removal of two (2) permitted diesel-fired emergency generators, addition of two (2) new diesel-fired emergency generators with selective catalytic reduction (SCR) controls, adding capability to combust renewable diesel fuels, and other typographical updates.

The estimated maximum quantities of any regulated air contaminant will be as follows in pound per hour (pph) and tons per year (tpy) and may change slightly during the course of the Department's review.

The below-listed pound per hour emission rates would only occur during an emergency power loss to the facility, which are anticipated to be rare occurrences and short in duration. These values are not indicative of normal facility operations.

Pollutant:	Pounds per hour	<u>Tons per year</u>
Particulate Matter (PM) 10	207 pph	22.4 tpy
PM <sub>2.5</sub>	207 pph	22.4 tpy
Sulfur Dioxide (SO <sub>2</sub> )	5.0 pph	0.12 tpy
Nitrogen Oxides (NO <sub>x</sub> )	4,635 pph	99.9 tpy
Carbon Monoxide (CO)	779 pph	99.9 tpy
Volatile Organic Compounds (VOC)	255 pph	22.3 tpy
Total sum of all Hazardous Air Pollutants (HAPs)	5.2 pph	0.13 tpy
Toxic Air Pollutants (TAPs)	0 pph	0 tpy
Green House Gas Emissions as Total CO2e	N/A	< 75,000 tpy

The standard operating schedule of the facility will be from 7:00 a.m. to 5:00 p.m. 5 days a week and a maximum of 52 weeks per year. The maximum operating schedule will be from 12:00 a.m. to 11:59 p.m. 7 days a week and a maximum of 52 weeks per year.

The owner and operator of the facility will be Greater Kudu LLC, the address for which is 4250 Messenger Loop NW, Los Lunas, New Mexico 87031.

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager; New Mexico Environment Department; Air Quality Bureau; 525 Camino de los Marquez, Suite 1; Santa Fe, New Mexico; 87505-1816. Other comments and questions may be submitted verbally. (505) 476-4300; 1 800 224-7009.

Please refer to the company name and facility name, or send a copy of this notice along with your comments, since the Department may have not yet received the permit application. Please include a legible return 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.

#### Atención

Este es un aviso de la oficina de Calidad del Aire del Departamento del Medio Ambiente de Nuevo México, acerca de las emisiones producidas por un establecimiento en esta área. Si usted desea información en español, por favor comuníquese con esa oficina al teléfono 505-629-3395.

Sincerely, Greater Kudu LLC 4250 Messenger Loop NW, Los Lunas, New Mexico 87031

#### **Notice of Non-Discrimination**

NMED does not discriminate on the basis of race, color, national origin, disability, age or sex in the administration of its programs or activities, as required by applicable laws and regulations. NMED is responsible for coordination of compliance efforts and receipt of inquiries concerning non-discrimination requirements implemented by 40 C.F.R. Part 7, including Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and Section 13 of the Federal Water Pollution Control Act Amendments of 1972. If you have any questions about this notice or any of NMED's non-discrimination programs, policies or procedures, or if you believe that you have been discriminated against with respect to a NMED program or activity, you may contact: Non-Discrimination Coordinator, NMED, 1190 St. Francis Dr., Suite N4050, P.O. Box 5469, Santa Fe, NM 87502, (505) 827-2855, nd.coordinator@env.nm.gov. You may also visit our website at https://www.env.nm.gov/non-employee-discrimination-complaint-page/ to learn how and where to file a complaint of discrimination.

Sample of Posted Public Notice and Verification of Postings

# NOTICE

Greater Kudu LLC announces its application to the New Mexico Environment Department for an air quality permit for the modification of its data center facility. The expected date of application submittal to the Air Quality Bureau is March 15, 2024.

The exact location for the proposed facility known as, Greater Kudu LLC, is at latitude 34.82854 dec deg North and longitude -106.78151 dec deg West. The approximate location of this facility is 0.30 miles northwest of the intersection of Los Morros Road and Sandsage Court in Valencia County.

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Green House Gas Emissions as Total CO2e	N/A	< 75,000 tpy

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With your comments, please refer to the company name and facility name, or send a copy of this notice along with your comments. This information is necessary since the Department may have not yet received the permit

application. Please include a legible return mailing address. Once the Department has completed its 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.

#### Atención

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nd.coordinator@env.nm.gov. You may also visit our website at https://www.env.nm.gov/non-employee-discrimination-complaint-page/ to learn how and where to file a complaint of discrimination.

### **General Posting of Notices – Certification**

I, Mario Hidalgo, the undersigned, certify that on March 14, 2024, posted a true and correct copy of the attached Public Notice in the following publicly accessible and conspicuous places in the Village of Los Lunas of Valencia County, State of New Mexico on the following dates:

- 1. Facility entrance: March 14, 2024.
- 2. The Daniel Fernandez Recreation Center at 1103 Highway 314 NW, Los Lunas, New Mexico: March 14, 2024.
- 3. The Los Lunas Public Library at 460 Main St NE, Los Lunas, New Mexico: March 14, 2024.
- 4. The Valencia County Services Building at 444 Luna Ave SE, Los Lunas, New Mexico: March 14, 2024.

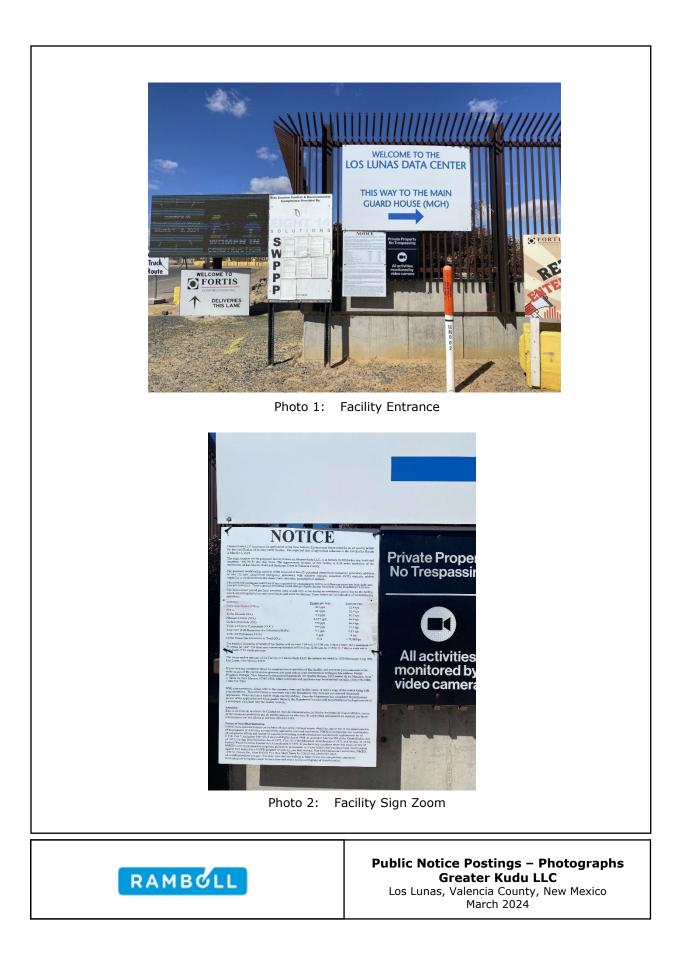
Signed this 13 day of March , 2024,

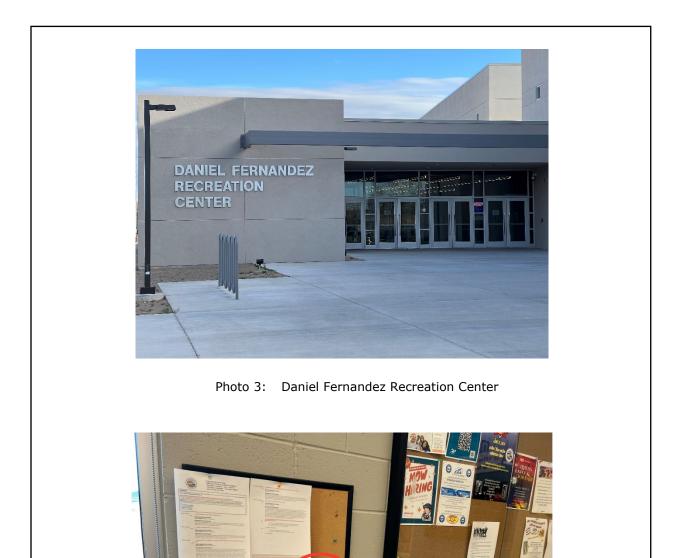
**Šignature** 

13/24

**Mario Hidalgo** Printed Name

Environmental, Health & Safety Campus Lead Title







NOTICE

Photo 4: Daniel Fernandez Recreation Center Posted Notice



Public Notice Postings – Photographs Greater Kudu LLC Los Lunas, Valencia County, New Mexico March 2024



Photo 5: Los Lunas Public Library



Photo 6: Los Lunas Public Library Posted Notice



Public Notice Postings – Photographs Greater Kudu LLC Los Lunas, Valencia County, New Mexico March 2024



Photo 7: Valencia County Services Building



Photo 8: Valencia County Services Building Posted Notice



Public Notice Postings – Photographs Greater Kudu LLC Los Lunas, Valencia County, New Mexico March 2024

### Section 9.7

Tables of Owners of Record, Municipalities, Counties, and Tribal Nations Notified

### Table 9.7.1 - Notified Municipalities, Counties, and Indian Tribes

Entity	Туре	Mailing Address		
		JULIE MORGAS BACA		
		COUNTY MANAGER		
Bernalillo	County	415 SILVER SW		
		8TH FLOOR		
		ALBUQUERQUE, NM 87102		
		DANNY MONETTE		
Valencia	Country	COUNTY MANAGER		
Valencia	County	P.O. BOX 1119		
		LOS LUNAS, NEW MEXICO 87031		
		ETHAN WATSON		
Albumune	N 4 unicipality	CITY CLERK		
Albuquerque	Municipality	P.O. BOX 1293		
		ALBUQUERQUE, NEW MEXICO 87103		
		ROSEANN PERALTA		
		CITY MANAGER		
Belen	Municipality	CITY OF BELEN		
		100 S. MAIN ST.		
		BELEN, NM 87002		
		VERNON ABEITA		
		VILLAGE CLERK/ADMINISTRATOR		
Bosque Farms	Municipality	1455 WEST BOSQUE LOOP		
		BOSQUE FARMS, NM 87068		
		GREGORY D. MARTIN		
		VILLAGE ADMINISTRATOR		
Los Lunas	Municipality	660 MAIN ST. NW		
		LOS LUNAS, NM 87031		
		KORI TAYLOR		
Peralta	Municipality	TOWN CLERK/ADMINISTRATOR		
		P.O. BOX 1830		
		PERALTA, NEW MEXICO 87042		
		GOVERNOR MAX ZUNI		
Pueblo of Isleta	Tribal Nation	PUEBLO OF ISLETA		
	Tribal Nation	P.O. BOX 1290		
		ISLETA, NM 87022		

#### Table 9.7.2 - Notified Property Owners (within 100 feet of property boundary)

Site	Site Address	Owner	Mailing Address	UPC #
PNM SOLAR FARM	1501 ATHENE DRIVE NW HUNING RANCH BUSINESS PARK Tract: A3B	NMRD DATA CENTER LLC (PNM)	NMRD DATA CENTER LLC 414 SILVER SW ALBUQUERQUE, NM 87102	1006040506270000000
FRESENIUS MEDICAL CARE	549 SAND SAGE RD NW LOS MORROS BUSINESS PARK Tract: C1A	SOUTHWEST HARMON PROPERTIES LLC	SOUTHWEST HARMON PROPERTIES LLC 4140 LOCKBOURNE ROAD COLUMBUS, OH 43207	1007039210401000000
VACANT LAND TO THE NORTHWEST	4410 MESSENGER LOOP NW HUNING RANCH BUSINESS PARK Lot: 3	FEE OWNER: VILLAGE OF LOS LUNAS	VILLAGE OF LOS LUNAS 660 MAIN STREET LOS LUNAS, NM 87031	1006040347159
WAL-MART DISTRIBUTION CENTER	670 LOS MORROS RD NW LOS MORROS BUSINESS PARK Tract: A	FEE OWNER: VILLAGE OF LOS LUNAS	WAL-MART DISTRIBUTION CENTER PO BOX 1209 LOS LUNAS, NM 87031	1007039330520000000
VACANT LAND TO THE WEST	LANDS OF HUNING LIMITED PARTNERSHIP Tract: AA	HUNING LIMITED PARTNERSHIP	HUNING LIMITED PARTNERSHIP PO BOX 178 LOS LUNAS, NM 87031	1005040236117
VACANT LAND TO THE WEST	LAND OF HUNING LIMITED PARTNERSHIP Lot: PARCEL 2	FEE OWNER: VILLAGE OF LOS LUNAS	VILLAGE OF LOS LUNAS 660 MAIN STREET LOS LUNAS, NM 87031	1006040100180000000
VACANT LAND TO EAST	LOS MORROS BUSINESS PARK Tracts: C2A1, L-1, E-1	LOS MORROS INVESTMENT GROUP LLC	LOS MORROS INVESTMENT GROUP LLC 7615 INDIAN SCHOOL RD NE ALBUQUERQUE, NM 87110	1007039204362000000; 1007039200325000000; 1007039195285000000
VILLAGE OF LOS LUNAS FIRE STATION NO 2	465 SAND SAGE RD NW LOS MORROS BUSINESS PARK Tract: C2A2	FEE OWNER: VILLAGE OF LOS LUNAS	VILLAGE OF LOS LUNAS 660 MAIN STREET LOS LUNAS, NM 87031	1007039201340000000
VACANT LAND TO SOUTHWEST	Tract: 13-2	NEW MEXICO DEPARTMENT OF TRANSPORTATION	NEW MEXICO DEPARTMENT OF TRANSPORTATION PO BOX 1149 SANTA FE, NM 87504-1149	1006039133298
VACANT LAND TO SOUTHWEST	LEGACY AT SIERRA VISTA Tract: D1	SIERRA VISTA LOS LUNAS LLC	SIERRA VISTA LOS LUNAS LLC 3211 HIGHWAY 47 LOS LUNAS, NM 87031	1006039110270
VACANT LAND TO SOUTHWEST	PHASE THREE LEGACY AT SIERRA VISTA Tract: 15	DOUBLE M PROPERTIES INC	DOUBLE M PROPERTIES INC 4400 ALAMEDA BLVD NE SUITE E ALBUQUERQUE, NM 87113	1006039063348
VACANT LAND TO SOUTHWEST	VISTA SANDIA AT SIERRA VISTA PHASES 1 & 2 Tracts: 1, 8	DOUBLE M PROPERTIES INC	DOUBLE M PROPERTIES INC 4400 ALAMEDA BLVD NE SUITE E ALBUQUERQUE, NM 87113	1005039443378; 1005039389399
VACANT LAND TO SOUTHWEST	SIERRA VISTA Tract: A1	SIERRA VISTA LOS LUNAS LLC	SIERRA VISTA LOS LUNAS LLC 3211 HIGHWAY 47 LOS LUNAS, NM 87031	1005039276356
VACANT LAND TO EAST	HUNING RANCH BUSINESS PARK Lot: 4	FEE OWNER: VILLAGE OF LOS LUNAS	VILLAGE OF LOS LUNAS 660 MAIN STREET LOS LUNAS, NM 87031	1007039193424
VACANT LAND TO EAST	HUNING RANCH BUSINESS PARK Tract: A5	FEE OWNER: VILLAGE OF LOS LUNAS	VILLAGE OF LOS LUNAS 660 MAIN STREET LOS LUNAS, NM 87031	1007040209067000000

### Section 9.8

Copy of Public Service Announcement Sent to Local Radio Station and Proof of Submittal

### Public Service Announcement for NMED Air Permit

As required by the New Mexico Administrative Code, Greater Kudu LLC, owner/operator of the Greater Kudu LLC data center announces it has applied to the New Mexico Environment Department for a proposed modification to the facility's air quality permit, including the removal of two (2) permitted diesel-fired emergency generators, addition of two (2) new diesel-fired emergency generators with selective catalytic reduction (SCR) controls, adding capability to combust renewable diesel fuels, and other typographical updates.

The location of the facility is approximately 0.30 (point 30 miles) miles northwest of the intersection of Los Morros Road and Sandsage Court in Los Lunas, Valencia County, New Mexico.

Notices regarding the proposed air quality permit required under New Mexico Administrative Code 20.2.72.203.B.4 have been posted at the following locations:

- The Facility entrance
- The Daniel Fernandez Recreation Center at 1103 Highway 314 NW, Los Lunas, New Mexico
- The Los Lunas Public Library at 460 Main St NE, Los Lunas, New Mexico and
- The Valencia County Services Building at 444 Luna Ave SE, Los Lunas, New Mexico

Comments or inquiries about the facility may be directed to: Permit Programs Manager; New Mexico Environment Department, Air Quality Bureau, at 525 Camino de los Marquez, Suite 1; Santa Fe, New Mexico 87505-1816.

### Submittal of Public Service Announcement – Certification

I, <u>Eri Ottersburg</u>, the undersigned, certify that on March 8, 2024, submitted a public service announcement to KABG 98.5 FM that serves the Village of Los Lunas, Valencia County, New Mexico, in which the source is or is proposed to be located and that KABG 98.5 FM responded that it would air the announcement.

Signed this <u>15</u> day of <u>March</u>, <u>2024</u>,

tersburg

Signature

<u>3/15/2024</u> Date

### Eri Ottersburg

Printed Name

Managing Consultant, Ramboll (Preparer) Title

### Section 9.9

Copy of Legal Ad Sent to Local Newspaper

# Woman finds body of dead man in Casa Colorada

**By Julia M. Dendinger** *News-Bulletin Assistant Editor* 

The Valencia County Sheriff's Office is investigating a suspicious death in the Casa Colorada area south of the city of Rio Communities.

A woman walking in the 40 block of Lagrima Road called 911 to report a body in the area, said VCSO Lt. Joseph Rowland. The call came in at 8:46 a.m., Wednesday, March 6.

Deputies did locate the

body of a man in the area when they responded to the call, Rowland said. The man doesn't match the description of anyone reported missing from Valencia County.

A perimeter was established and the sheriff's office criminal investigation division requested assistance from the New Mexico State Police for crime scene processing. That was completed on Thursday, March We are treating it as a suspicious death," Rowland said. Once VCSO and NMSP

stages on the investigation.

processed the scene, the state Office of the Medical Investigator was contacted.

If a community member feels they might have information regarding this incident they are asked to call the Valencia County Sheriff's Office at 505-866-2400.

#### "We are still in the early

# Mobile home destroyed by fire

### By Jessica Carranza

El Defensor Chieftain Editor

#### VEGUITA

A house fire in the Ranchos de Veguita subdivision in northern Socorro County resulted in a total loss of the residence.

North Socorro County Fire Chief Shawn Watkins said firefighters responded to a call at 8:53 p.m., Wednesday, March 6, on Wallner Drive.

Midway, Rio Communities and Valencia County fire departments also joined the effort. The crews worked through the night and were able to clear the scene by Thursday morning. Socorro Electric Co-op removed a pole that had fallen over.

"The first arriving unit described it as a sea of fire," said Watkins, "As far as we are aware, there was at least one explosion of a propane tank, but nobody was hurt, and nobody was inside the house."

He said, at first, when the call came

in, they were advised the house was abandoned, but that didn't end up being the case.

"I don't know entirely the truth of that situation. At some point, there was somebody living there," Watkins said. "We don't know whether it was their residence, or they were just kind of squatting there."

He said they were advised an animal was inside of the residence. Out of five dogs, only four were located, and it's currently unknown if one dog perished in the fire or ran away.

"As far as we are aware, it was a single-wide mobile home that had a couple other additions added on to it and one or two camper trailers from what we can tell by the frames," Watkins said. "It was a total loss."

Watkins said the property owner left before he could make contact with them. There were no injuries to civilians or firefighters reported.

### **OPTIMIST CLUB ORATORICAL CONTEST**



Submitted photo

Rio Communities Optimist Club held an Oratorical Contest on Feb. 1, 2024. This contest was for youth to gain experience in public speaking and improve communication skills. The contest provides them with the opportunity to compete for a college scholarship. The topic for the speech was "How to change the world with Optimism." Rhea Romero, from Los Lunas High School, placed first at club level and received a \$500 scholarship. Isabella Landavaza, from Belen High School, placed second. Pictured, from left are, Rhea Romero, Optimist member Loedi Silva, Isabellla Landavaza and Optimist member Steve Togami.

### ICE FISHERMAN

Photo courtesy of N.M. Game and Fish Jimmy Ortiz, of Bosque Farms, caught his limit of rainbow trout, with the biggest being 15-inches long, while ice fishing at Eagle Nest Lake using Salmon Peach PowerBait on Feb. 16. If you have a catch of the week story or just want to brag about your latest New Mexico fishing experience, send it to funfishingnm@ gmail.com.



GOV'T LEGALS	GOV'T LEGALS	GOV'T LEGALS	GOV'T LEGALS	GOV'T LEGALS	NON-GOV'T LEGALS	NON-GOV'T LEGALS	NON-GOV'T LEGALS
A Chingson	2) Pledge of Allegiance	036-500-020-000000; Zoned Rural Residential District 1 (RR-1)	Members of the public may at- tend in person, and anyone	mary or any type of accessible format is needed.	for Foreclosure relating to real property owned by Michael Anthony Gabbart, located at	3200. WITNESS the Honorable	FINLAYSON LAW FIRM, I By: /s/ David A. Finlayson
Valencia County	3) Approval of Agenda	B. Zone Change #2024-020	can view and listen to the meeting via Facebook Live at	Published in the Valencia County News-Bulletin March	Wells Fargo Bank, N.A., as	Elaine P. Lujan, District Judge	Attorney for the Personal resentative of the Estat
	4) Approval of the February	(District II, P&Z Commissioner	the following link: https://www.	7, 14, 21, 2024		Court of the State of New	Henry J. Racette, Decease
	2024 Planning & Zoning Com- mission Minutes	Gilberto Carbajal requests a	facebook.com/ VCAdminandGov/	NON-GOV'T LEGALS	dated May 14, 2003, and the	Mexico and the Seal of the District Court of Bernalillo	7301 Jefferson Street Suite F
PHA ASSA	<ul><li>5) Staff Reports</li><li>6) Swearing-In of Participants</li></ul>	Zone Change from Rural Resi- dential District 1 (RR-1) to	If you are an individual with a	Casa Self Storage will hold an		County on 12/14/23 Second Judicial District Court Clerk of	Albuquerque, NM 87109 (505) 373-3500
	7) Action Item(s)	Neighborhood Commercial District (C-1) with a Condition-	disability who has special needs, please contact the	online auction at storageauctio		s/ Isaiah B. Lujan, Deputy	Published in the Vale
VALENCIA COUNTY	A. Zone Change #2024-018	al Use to operate an RV park. Legal Description: Subd: ME-	Planning and Zoning Office at the Valencia County Court-	n.com, in accordance with pro- vision of the NM Self-Service	CIA County, New Mexico,	Clerk.	County News-Bulletin N 14, 21, 28, 2024
PLANNING & ZONING COMMISSION	(District II, P&Z Commissioner Freeman, BoCC Richardson)	1/2 OF 20 S: 25 T: 7N B: 3E:	house, Los Lunas, New Mexi- co, (505) 866-2050 at least	storage Lien Act, to sell per-	more particularly described as:	Published in the Valencia County News-Bulletin March	THIRTEENTH JUDICIAL
AGENDA	Blas Martinez requests a Zone Change from Rural Residen-	located on Meadowlake Rd	one week prior to the meeting or as soon as possible. Public	low belonging to those individ- uals listed below at the loca-	A CERTAIN PARCEL OF LAND COMPRISING A POR-	14, 21, 28, 2024	TRICT COURT COUNTY OF VALENCIA
Tuesday March 26, 2024	tial District 1 (RR-1) to Neigh- borhood Commercial District	1018038030163; Zoned Rural	documents, including the agenda and minutes, can be	tion indicated: Casa Self Stor-		STATE OF NEW MEXICO COUNTY OF VALENCIA	STATE OF NEW MEXICO
3:00 pm Valencia County	(C-1) to operate a food truck		provided in accessible for-		AS SHOWN ON THE SUR-	THIRTEENTH JUDICIAL DIS-	No.D-1314-PB-2024-0
Administration Building	on the property. Legal De- scription: Subd: EL CERRO	8) Next Meeting of the County Planning & Zoning Commis-	mats. Please contact the Va- lencia County Planning and		VEYS OF MAP 105, M.R.G.C. D., AND BEING MORE PAR-	TRICT	IN THE MATTER OF THE
Commission Chambers 4 Luna Ave, Los Lunas, NM	MISSION RANCHETTES Tract: B Unit: 1 SPACE:	2024 at 3:00p.m.	Zoning Office at the Valencia County Courthouse if a sum-	Castillo Rd. Los Lunas, NM,	TICULARLY DESCRIBED AS FOLLOWS: BEGINNING AT	Case No. D-1314-PB-2023- 00132	TATE OF FRANCISCO ESQUIBEL, SR., Decease
87031	M222266; also known as 144 El Cerro Mission Blvd, Los Lu-		<u> </u>	87031.710.00 Mechanics tool box, luggage,	THE NORTHEAST CORNER OF THE TRACT HEREIN DE-	IN THE MATTER OF THE ES-	NOTICE TO CREDITOR
Call to Order	nas, NM 87031; UPC 1-013-			misc. items.	SCRIBED A POINT ON THE WESTERLY R/W LINE U.S.	TATE OF JOAN E. KORASTINSKY, DECEASED.	NOTICE IS HEREBY G
NON-GOV'T	NON-GOV'T	NON-GOV'T	NON-GOV'T	#127 – Marquita Ortiz ,1052 Castillo Rd. Los Lunas, NM,	HIGHWAY NO. 85, WHENCE THE A.T. AND S.F.R.R.R.	NOTICE TO CREDITORS	that the undersigned has appointed Personal Repre
EGALS	LEGALS	LÉGALS	LEGALS	87031. 690.00	MILE POST NO. 936 BEARS		tative of the Estate of FI CISCO R. ESQUIBEL,
NOTICE OI	F AIR OUALIT	Y PERMIT APP	PLICATION	compressor, Antique cash reg-	FEET DISTANT; THENCE	that MARIBEL GONZALEZ	All persons having cl
				ister, plastic totes, and misc. items.	12'46"W, 189.56 FEET TO	REYNOSO has been appoint- ed Peronal Representative of	against this Estate are quired to present their cl
		the New Mexico Environment I are expected date of application		#153 – Ashley Jaramillo/ Ruben Abeita, PO Box 5	THE SOUTHEAST CORNER; THENCE RUNNING N 69	the Estate of Joan E. Korastinsky, deceased. All	within four months afted date of the first publication
Bureau is March 15, 2024.		i approation	· ···· · ··· · ······	Isleta, NM 87022.	DEG. 35'54"W, 134.41 FEET TO A POINT; THENCE RUN-		
		eater Kudu LLC, is at latitude		1,100.00 Sleeping bag, bicy- cles, backpacks, grill and misc. items.	NING N 87 DEG. 22'46"W, 9.	required to present their	must be presented eith the undersigned Per
	deg West. The approximate Road and Sandsage Court in V	location of this facility is 0.	.30 miles northwest of the	#46 – Robert Archibeque, 1176 Jaramillo CtLos Lunas,		claims within four (4) months after the date of the first publi-	Representative at Post (
	-	-		NM 87031.	FEET TO THE NORTHWEST	to creditors or sixty (60) days	87002, or filed with the
		o (2) permitted diesel-fired emo lective catalytic reduction (SCR		1,130.00 Power washer, ice chest, buckets, painters tools	CORNER; THENCE S 84 DEG. 00'17"E, 139.00 FEET	after the date of mailing or oth- er delivery of this notice,	teenth Judicial District ( Los Lunas, New M
	el fuels, and other typographica		) controls, adding capacity	and misc. items. #101 – Jacklyn Hubbard, 2308	TO THE NORTHEAST COR-	whichever is later, or the claims will be forever barred.	87031.
		contaminant will be as follows i			NING. SAID TRACT IS ALSO	Claims must be presented ei-	DATED this 13th day of ruary, 2024.
1 5 (15)	8 8 9 8	ourse of the Department's revie			SHOWN AS TRACT 1 ON THE SURVEY AND PLAT SHOWING LANDS OF BEN	ther to counsel for the person- al representative, Thomas	
		only occur during an emergence duration. These values are not		1 # 143 – William Fosnee, 13	OLGLIN FILED IN BOOK 11	Smidt III, Smidt, Reist & Keleher, P.C., 4811-A Hard-	RAE C. VALLEJOS Personal Representative
operations.	face occurrences and short in t	duration. These values are not	indicative of normal identity	50.00	PAGE 291, RECORDS OF	ware Drive NE, Suite 4, Albu- guergue, New Mexico 87109	Estate of FRANCISCC ESQUIBEL, SR.
Pollutant:		Pounds per hour	Tons per year	Ladder, tools, extension cords, totes, tool bag and misc. items	MEXICO.	or filed with the Thirteenth Ju-	-
Particulate Matter (PM) 10		207 pph	22.4 tpy	#148 – Margaret Calles, 102 Camino De Las Chavez	Published in the Valencia	County of Valencia, New Mex-	NORMAN McDONALD, P
PM 2.5		207 pph	22.4 tpy	Belen, NM 87002. 650.00 Bedroom furniture, and	County News-Bulletin March 14, 21, 28, 2024	ico, located at the following address: 1835 Highway 314	Attorney for Estate of F
Sulfur Dioxide (SO <sub>2</sub> ) Nitrogen Oxides (NO <sub>x</sub> )		5.0 pph 4,635 pph	0.12 tpy 99.9 tpy	misc. Boxes.	NOTICE OF PUBLIC AUC-	SW, Los Lunas, NM 87031. Dated: February 12, 2024	CISCO R. ESQUIBEL, SF Post Office Box 949
Carbon Monoxide (CO)		4,033 ppn 779 pph	99.9 tpy	#B02 – Ernest or Ann Baca, 517 S. 7th Belen, NM 87002.	TION TUESDAY, JUNE 4, 2024, 10 A.M @ 8A JOUR-	SMIDT, REIST & KELEHER,	Belen, New Mexico 87002 (505) 864-3333
Volatile Organic Compour	nds (VOC)	255 pph	22.3 tpy	690.00 General household and misc items	NEY RD, LOS LUNAS, NM. The following vehicle will be	P.C.	Published in the Val
Total sum of all Hazardou	. ,	5.2 pph	0.13 tpy	#144 – Ethan Alter, PO Box 4025 Albuquerque, NM 87196.	sold to satisfy debt to GREG- ORY QUINTANA, per NM	By: /s/ Thomas Smidt III Attorney for Personal Repre-	County News-Bulletin F ary 29, March 7, 14, 2024
Toxic Air Pollutants (TAP	,	0 pph	0 tpy	480.00 General household and misc	State law: 1962 OLDS	sentative	THIRTEENTH JUDICIAL
Green House Gas Emissio	ns as Total $CO_2e$	N/A	< 75,000 tpy	items	626M16648, \$2039.59 NO	4811-A Hardware Drive NE, Suite 4	TRICT COURT COUNTY OF VALENCIA
The standard operating sche	edule of the facility will be fro	m 7:00 a.m. to 5:00 p.m. 5 days	a weak and a maximum of	Edmundo Rd Belen, NM		Albuquerque, NM 87109 (505) 830-2200	STATE OF NEW MEXICO
2 weeks per year. The max			s a week and a maximum of				
· ·	kimum operating schedule will	l be from 12:00 a.m. to 11:59 p.		87002. 725.00 Bedroom set, washer, dryer	Published in the Valencia	tsmidt3@srklawnm.com	
	kimum operating schedule will	be from 12:00 a.m. to 11:59 p		Bedroom set, washer, dryer and misc. household items. #119 – Brandi Gibbs. 70	County News Bulletin March	Published in the Valencia	No.D-1314-PB-2024-0
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NMED is res non-discrimination requirement f 1964, as amended; Section 50 the Education Amendments of 2. If you have any questions ab lures, or if you believe that you may contact: Non-Discriminati	m. 7 days a week and a 50 Messenger Loop NW, ant your comments to be this address: Permit mino de los Marquez, Suite d verbally. (505) 476-4300; your comments, since the eturn mailing address with ation and its air quality reulated near the facility Quality Bureau's web site: h public participation in the e de Nuevo México, acerca ión en español, por favor r sex in the administration sponsible for coordination ts implemented by 40 44 of the Rehabilitation Act 1972, and Section 13 of the out this notice or any of have been discriminated on Coordinator, NMED,	Bedroom set, washer, dryer and misc. household items. #119 – Brandi Gibbs, 70 Edmundo Rd Belen, NM 87002. 858.00 Furniture, 4 drawer filing cabi- net, misc. Items and boxes. #55 – Cippy Saiz, 2092 Vista Hill North Loop Los Lunas, NM 87031. 756.07 General household and misc items The auction will be listed and advertised in the VALENCIA COUNTY NEWS BULLETIN . Purchases must be made with credit / debit card only and paid to the above referenced facility in order to complete the transaction. We require a \$100 cash deposit. 72 hour clean out time. Casa Self Storage may refuse any bid and may rescind any purchase up until the winning bidder takes possession of the personal property. Published in the Valencia County News Bulletin March 14, 21, 2024 FOR THE UNKNOWN SPOUSE OF MICHAEL AN- THONY GABBART AND ALL OCCUPANTS OF THE PROPERTY COMMONLY KNOWN AS 1294 SOUTH HIGHWAY 116, BELEN, NEW MEXICO 87002 Applicant, Wells Farron Bank N A	County News Bulletin March 14, 21, 2024 STATE OF NEW MEXICO COUNTY OF BERNALILLO SECOND JUDICIAL DIS- TRICT COURT No. D-202-CV-2023-04212 Rio Grande Credit Union, Plaintiff v. KENNETH MICHAEL BREHAUT Defendant NOTICE OF PENDENCY OF SUIT TO Defendant, KENNETH MI- CHAEL BREHAUT. You are hereby notified that the above-named Plaintiff has filed a civil action against you in the above-entitled Court and cause, the general object thereof being to recover mon- ey due on a deficiency bal- ance on a 8/18/22 contract. That unless you respond to the Complaint within 30 days of completion of publication of this Notice, judgment by de- fault will be entered against you. Name, address, and phone number of Plaintiffs attorney:	Published in the Valencia County News-Bulletin: Febru- ary 29, March 7, 14, 2024 STATE OF NEW MEXICO COUNTY OF VALENCIA THIRTEENTH JUDICIAL DIS- TRICT COURT No. D-1314-PB-2024-00024 In the Matter of the Estate of HENRY J. RACETTE, De- ceased NOTICE TO CREDITORS NOTICE IS HEREBY GIVEN that the undersigned has been appointed Personal Represen- tative of this estate. All per- sons having claims against this estate are required to present their claims within four months after the date of the first publication of this Notice or the claims must be pre- sented either to David A. Finlayson, attorney for the es- tate of Henry J. Racette, at FINLAYSON LAW FIRM, PC, 7301 Jefferson Street NE, Suite F, Albuquerque, NM 87109, or filed with the Thir- teenth Judicial District Court, Valencia County Courthouse, 1835 NM-314, Los Lunas, NM 87031. Dated: March 5, 2024	No.D-1314-PB-2024-0 IN THE MATTER OF THI TATE OF PATSY G. S Deceased. NOTICE IS HEREBY G that the undersigned has appointed Personal Repr tative of the Estate of P/ G. SHUE. All persons h claims against this Estat required to present claims within four months the date of the first public of this Notice or the claim be forever barred. C must be presented eith the undersigned Per Representative at Post ( Box 949, Belen, New M 87002, or filed with the teenth Judicial District O Los Lunas, New M 87031. DATED this 16 day of F ary, 2024. WALTER RAMEY SHUE Personal Representative Estate of PATSY G. SHUI Prepared by: NORMAN McDONALD, P Attorney for Estate of P/ G. SHUE
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Toxic Air Pollutants (TAPs)	0 pph	0 tpy
Green House Gas Emissions as Total CO2e	N/A	< 75,000 tpy

The standard operating schedule of the facility will be from 7:00 a.m. to 5:00 p.m. 5 days a week and a maximum of 52 weeks per year. The maximum operating schedule will be from 12:00 a.m. to 11:59 p.m. 7 days a week and a maximum of 52 weeks per year.

The owner and operator of the facility is Greater Kudu LLC, the address for which is 4250 Messenger Loop NW, Los Lunas, New Mexico 87031.

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager; New Mexico Environment Department; Air Quality Bureau; 525 Camino de los Marquez, Suite 1; Santa Fe, New Mexico; 87505-1816. Other comments and questions may be submitted verbally. (505) 476-4300; 1 800 224-7009.

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General information about air quality and the permitting process can be found at the Air Quality Bureau's web site: www.env.nm.gov/air-quality/permitting-section-home-page/. The regulation dealing with public participation in the permit review process is 20.2.72.206 NMAC.

#### Atención

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#### Notice of Non-Discrimination

NMED does not discriminate on the basis of race, color, national origin, disability, age or sex in the administration of its programs or activities, as required by applicable laws and regulations. NMED is responsible for coordination of compliance efforts and receipt of inquiries concerning non-discrimination requirements implemented by 40 C.F.R. Part 7, including Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and Section 13 of the Federal Water Pollution Control Act Amendments of 1972. If you have any questions about this notice or any of NMED's non-discrimination programs, policies or procedures, or if you believe that you have been discriminated against with respect to a NMED program or activity, you may contact: Non-Discrimination Coordinator, NMED, 1190 St. Francis Dr., Suite N4050, P.O. Box 5469, Santa Fe, NM 87502, (505) 827-2855,

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### Section 9.10

Copy of Display Ad Sent to Local Newspaper

# Store: Valencia County commissioners will now consider the zone change

#### from PAGE 1

voted 5-0 to recommend denial of the zone change request brought by Overland Engineering.

The planning and zoning commission is only a recommending board in regards to zone changes, and the application will go forward to the Valencia County Commission for a second public hearing and vote on the request. A date for that meeting has not been set.

The zone change request application was filed in September 2023, but Overland requested it be tabled in order to be better prepared for the hearing. At the February meeting, the only representative for the development company was the surveyor, Jayson Natera, who said he had been provided virtually no information about the project. When asked for details about who would foot the bill for needed infrastructure at the site and why that specific location had been chosen, Natera told the commissioners he had no information other than a zone change was being requested.

The nearly two acre lot is located at the intersection of N.M. 116 and E. Baca Lane in Pueblitos, south of the city of Belen. Overland has requested a zone change from rural residential 2 to commercial 2.

Manuel Romero, who lives with his mother on Pueblitos Road and is adjacent to the property, told the planning and zoning commissioners while he was pro growth, his community was not a priority growth area as per the county's 2022 comprehensive plan. "I know you can change zoning for development but we don't have the density. I am vehemently against this," Romero said. "I don't think it brings in any value for the community."

Romero, as well as other residents, pointed out there was already a Dollar General three miles to the north in Belen. In addition, there is a Family Dollar two blocks to the south and a Dollar Tree a couple blocks to the north of the existing Dollar General.

A special education teacher who takes care of his widowed mother, Romero said he fully understands the temptation of selling property to a developer like Overland.

"A few years ago, we were approached and offered hundreds

of thousands of dollars for two acres. Just under a million dollars," he said. "We thought it through and in good conscious couldn't do that to the people who lived there. That money would have helped make life a lot easier.

"We will fight this every step of the way, if need be. It just doesn't make sense for this community."

Other residents expressed concerns about increased traffic on N.M. 116 — both customers and large delivery trucks — which could lead to more crashes and pose a danger to the school buses that pick up and drop off students in the area.

Alex Taylor lives about a mile south of the property, which sits on the southern end of the stretch of highway between Castillo and Mill roads. Taylor said there have been numerous accidents and several fatalities on that section of highway, pointing out there's been an increase to traffic on N.M. 116 in the last several months due to Jarales Road to the east being closed for construction of a bridge at the railroad crossing on that highway.

"We are a very rural area and this is not needed. If I wanted the convenience of a Dollar General, I would have moved to town," Taylor said. "It is imperative those of us who live in this community be listened to ... We are farmers. We don't need this to be commercial."

## Elementary: Current art pieces in school will be implemented into new structure

from PAGE 1

the campus be taken down. "Despite the fact this

building has a great deal of cachet in the community, the recommendation was to build a new facility because this building is going to be very expensive and difficult to retrofit and meet current codes for accessibility, HVAC, IT ..." said Lacy.

However, there will be plenty of photo documentation of old structures and unique art on the campus that holds significance to the school community, Lacy said, and some of these can be adopted into the new building.

"It's not uncommon for us to go in and document murals, artwork and other features of the building and then replicate them in the new building with a vinyl wallpaper or window transparency to give honor to the people who provided art on the facility before," said Lacy.

Some physical art pieces, such as the two large mobiles in the current building, will also be reimplemented into the new space.

The interior look of the new building will be getting a revamp that Lacy said is inspired by the Southwest geography of the area and rich history of Peralta that "embraces a warm and welcoming interior that incorporates color and texture to foster a deep connection to nature."

According to a press release, "(the new building) will build on the rich traditions of the community and provide a state-of-the-art facility for future generations of students."

"The new Peralta Elementary School aims to revolutionize education by incorporating technology, flexible learning spaces and sustainable design principles," the press release stated. "Its design has been carefully crafted to promote collaboration, critical thinking and creativity, catering to the diverse needs and interests of our students."

The new campus will feature the latest in cuttingedge technology acquired by LLS, including interactive flat panels, multimedia learning tools and highspeed internet connectivity.

McMinn said it will also contain a STEM innovation lab and sensory room that, instead of being retrofitted into an existing space on campus, are thoughtfully designed into the new building to further accommodate those spaces.

The new building will also emphasize environmental sustainability. The press release noted "the building design achieves a 58 percent energy reduction when compared to the AIA 2030 Commitment climate goals strategy."

Plumbing fixtures and equipment will also be water conserving, lowwater use landscaping will be utilized and a synthetic turf play field will be implemented, which requires no water to maintain.

McMinn said in addition to all features of current district standards for safety and security, select windows on the new building will also receive bullet resistant laminate glazing within the glass as an added layer of security. Construction on the new building itself is scheduled for completion during the summer of 2025. The second phase dedicated to completing the remaining site work, such as the parking lot and playground is anticipated to be completed by 2026.

McMinn said students will remain on campus during construction in temporary classrooms as, "there's multiple buildings on that site, so we're able to adjust the way we utilize space to accommodate for every classroom."

The school and contractors will work together to coordinate when heavier construction will take place and where depending on what is going on in school that day to reduce distraction to students and staff.

"The construction of the new Peralta Elementary School demonstrates our commitment to providing a nurturing environment where students can thrive academically, socially and emotionally," said LLS Superintendent Ryan Kettler. "This school building is not just a structure, but a foundation for the dreams, aspirations and future of our community's youth."

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The standard operating schedule of the facility will be from 7:00 a.m. to 5:00 p.m. 5 days a week and a maximum of 52 weeks per year. The maximum operating schedule will be from 12:00 a.m. to 11:59 p.m. 7 days a week and a maximum of 52 weeks per year.

The owner and operator of the facility is Greater Kudu LLC, the address for which is 4250 Messenger Loop NW, Los Lunas, New Mexico 87031.

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager; New Mexico Environment Department; Air Quality Bureau; 525 Camino de los Marquez, Suite 1; Santa Fe, New Mexico; 87505-1816. Other comments and questions may be submitted verbally. (505) 476-4300; 1 800 224-7009.

Please refer to the company name and site name, or send a copy of this notice along with your comments, since the Department may have not yet received the permit application. Please include a legible return 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.

General information about air quality and the permitting process can be found at the Air Quality Bureau's web site: www.env.nm.gov/air-quality/permitting-section-home-page/. The regulation dealing with public participation in the permit review process is 20.2.72.206 NMAC.

#### Atención

Este es un aviso de la oficina de Calidad del Aire del Departamento del Medio Ambiente de Nuevo México, acerca de las emisiones producidas por un establecimiento en esta área. Si usted desea información en español, por favor comuníquese con esa oficina al teléfono 505-629-3395.

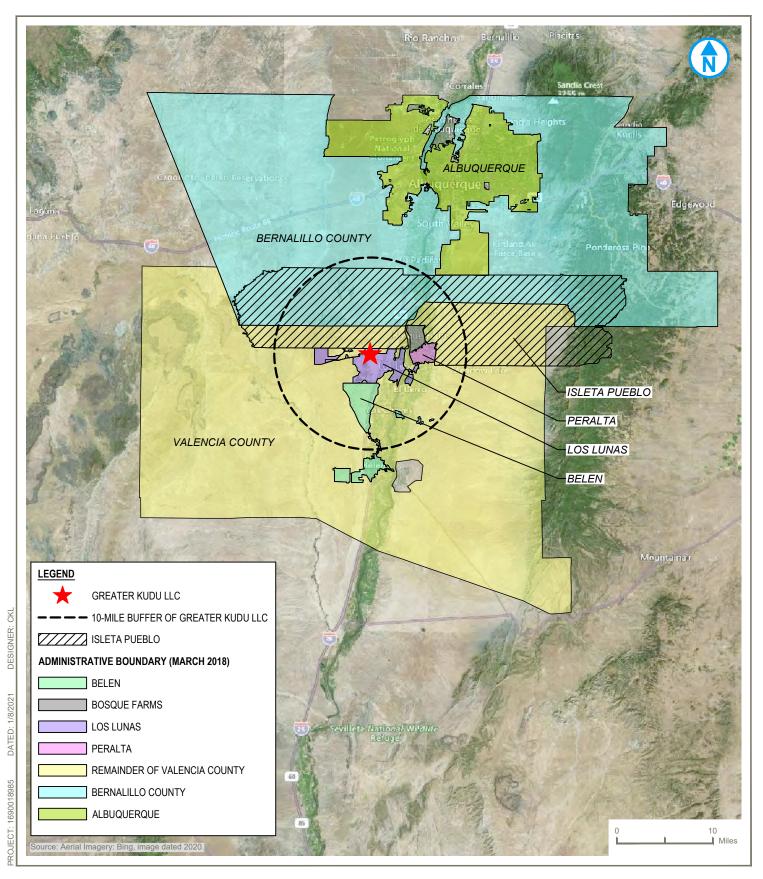
#### Notice of Non-Discrimination

NMED does not discriminate on the basis of race, color, national origin, disability, age or sex in the administration of its programs or activities, as required by applicable laws and regulations. NMED is responsible for coordination of compliance efforts and receipt of inquiries concerning non-discrimination requirements implemented by 40 C.F.R. Part 7, including Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and Section 13 of the Federal Water Pollution Control Act Amendments of 1972. If you have any questions about this notice or any of NMED's non-discrimination programs, policies or procedures, or if you believe that you have been discriminated against with respect to a NMED program or activity, you may contact: Non-Discrimination Coordinator, NMED, 1190 St. Francis Dr., Suite N4050, P.O. Box 5469, Santa Fe, NM 87502, (505) 827-2855,

nd.coordinator@env.nm.gov. You may also visit our website at https://www.env.nm.gov/non-employee-discrimination-complaint-page/ to learn how and where to file a complaint of discrimination.

### Section 9.11

Map of 100 Feet and 10 Mile Radii



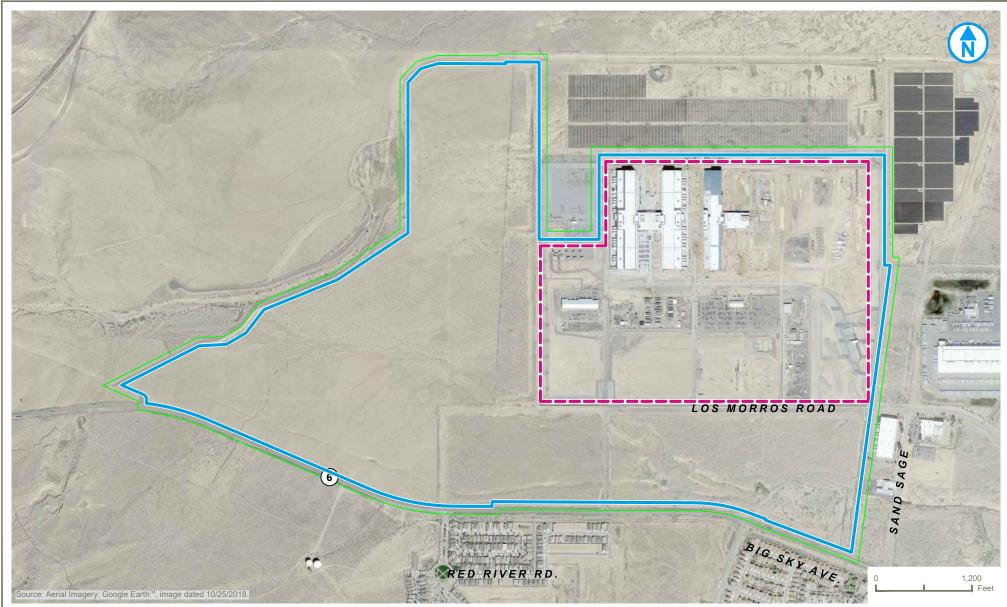
### NOTIFIED MUNICIPALITIES, COUNTIES, AND INDIAN TRIBES

### **FIGURE 03**

RAMBOLL AMERICAS ENGINEERING SOLLUTIONS, INC. A RAMBOLL COMPANY

**GREATER KUDU LLC** 4250 MESSENGER LOOP NW LOS LUNAS, NEW MEXICO

RAMBOLL



#### PROPERTY BOUNDARY (APPROXIMATE)

- BOUNDARY OF THE RESTRICTED AREA AROUND SITE OPERATIONS
  - 100 FT SURROUNDING PROPERTY BOUNDARY

## 100 FT BOUNDARY OF PROPERTIES NOTIFIED

### **FIGURE 04**

RAMBCLL

RAMBOLL AMERICAS ENGINEERING SOLLUTIONS, INC. A RAMBOLL COMPANY

**GREATER KUDU LLC** LOS LUNAS, NEW MEXICO

### Written Description of the Routine Operations of the Facility

<u>A written description of the routine operations of the facility</u>. 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.

See Sections 1 and 2 of the application report.

### **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, <u>Single Source Determination Guidance</u>, 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): N/A

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

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

□ Yes X No

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

□ Yes X No

<u>Contiguous</u> or <u>Adjacent</u>: Surrounding or associated sources are contiguous or adjacent with this source.

□ Yes X No

### C. Make a determination:

- X 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, <u>does not</u> 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.A

### **PSD Applicability Determination for All Sources**

(Submitting under 20.2.72, 20.2.74 NMAC)

<u>A PSD applicability determination for all sources</u>. 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 <u>EPA New Source Review Workshop Manual</u> to determine if the revision is subject to PSD review.

- A. This facility is:
  - X 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.

## **Determination of State & Federal Air Quality Regulations**

## This section lists each state and federal air quality regulation that may apply to your facility and/or equipment that are stationary sources of regulated air pollutants.

Not all state and federal air quality regulations are included in this list. Go to the Code of Federal Regulations (CFR) or to the Air Quality Bureau's regulation page to see the full set of air quality regulations.

#### **Required Information for Specific Equipment:**

For regulations that apply to specific source types, in the 'Justification' column **provide any information needed to determine if the regulation does or does not apply**. **For example**, to determine if emissions standards at 40 CFR 60, Subpart IIII apply to your three identical stationary engines, we need to know the construction date as defined in that regulation; the manufacturer date; the date of reconstruction or modification, if any; if they are or are not fire pump engines; if they are or are not emergency engines as defined in that regulation; their site ratings; and the cylinder displacement.

#### Required Information for Regulations that Apply to the Entire Facility:

See instructions in the 'Justification' column for the information that is needed to determine if an 'Entire Facility' type of regulation applies (e.g. 20.2.70 or 20.2.73 NMAC).

#### **Regulatory Citations for Regulations That Do Not, but Could Apply:**

If there is a state or federal air quality regulation that does not apply, but you have a piece of equipment in a source category for which a regulation has been promulgated, you must **provide the low level regulatory citation showing why your piece of equipment is not subject to or exempt from the regulation. For example** if you have a stationary internal combustion engine that is not subject to 40 CFR 63, Subpart ZZZZ because it is an existing 2 stroke lean burn stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, your citation would be 40 CFR 63.6590(b)(3)(i). We don't want a discussion of every non-applicable regulation, but if it is possible a regulation could apply, explain why it does not. For example, if your facility is a power plant, you do not need to include a citation to show that 40 CFR 60, Subpart OOO does not apply to your non-existent rock crusher.

### **Regulatory Citations for Emission Standards:**

For each unit that is subject to an emission standard in a source specific regulation, such as 40 CFR 60, Subpart OOO or 40 CFR 63, Subpart HH, include the low level regulatory citation of that emission standard. Emission standards can be numerical emission limits, work practice standards, or other requirements such as maintenance. Here are examples: a glycol dehydrator is subject to the general standards at 63.764C(1)(i) through (iii); an engine is subject to 63.6601, Tables 2a and 2b; a crusher is subject to 60.672(b), Table 3 and all transfer points are subject to 60.672(e)(1)

#### Federally Enforceable Conditions:

All federal regulations are federally enforceable. All Air Quality Bureau State regulations are federally enforceable except for the following: affirmative defense portions at 20.2.7.6.B, 20.2.7.110(B)(15), 20.2.7.11 through 20.2.7.113, 20.2.7.115, and 20.2.7.116; 20.2.37; 20.2.42; 20.2.43; 20.2.62; 20.2.63; 20.2.86; 20.2.89; and 20.2.90 NMAC. Federally enforceable means that EPA can enforce the regulation as well as the Air Quality Bureau and federally enforceable regulations can count toward determining a facility's potential to emit (PTE) for the Title V, PSD, and nonattainment permit regulations.

## INCLUDE ANY OTHER INFORMATION NEEDED TO COMPLETE AN APPLICABILITY DETERMINATION OR THAT IS RELEVENT TO YOUR FACILITY'S NOTICE OF INTENT OR PERMIT.

### EPA Applicability Determination Index for 40 CFR 60, 61, 63, etc: <u>http://cfpub.epa.gov/adi/</u>

All applicable state and federal regulatory provisions have been incorporated into the facility's current construction permit (Permit No. 7026-M5). No changes to either state or federal air regulatory applicability are being requested and/or otherwise triggered through this Minor NSR Permit application.

## 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 <u>Operational Plan to Mitigate Emissions During Startups, Shutdowns, and Emergencies</u> 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 <u>Operational Plan to Mitigate Source Emissions During</u> <u>Malfunction, Startup, or Shutdown</u> 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.

N/A

## **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.

**Construction Scenarios**: When a permit is modified authorizing new construction to an existing facility, NMED includes a condition to clearly address which permit condition(s) (from the previous permit and the new permit) govern during the interval between the date of issuance of the modification permit and the completion of construction of the modification(s). There are many possible variables that need to be addressed such as: Is simultaneous operation of the old and new units permitted and, if so for example, for how long and under what restraints? In general, these types of requirements will be addressed in Section A100 of the permit, but additional requirements may be added elsewhere. Look in A100 of our NSR and/or TV permit template for sample language dealing with these requirements. Find these permit templates at: <a href="https://www.env.nm.gov/air-quality/permitting-section-procedures-and-guidance/">www.env.nm.gov/air-quality/permitting-section-procedures-and-guidance/</a>. Compliance with standards must be maintained during construction, which should not usually be a problem unless simultaneous operation of old and new equipment is requested.

In this section, under the bolded title "Construction Scenarios", specify any information necessary to write these conditions, such as: conservative-realistic estimated time for completion of construction of the various units, whether simultaneous operation of old and new units is being requested (and, if so, modeled), whether the old units will be removed or decommissioned, any PSD ramifications, any temporary limits requested during phased construction, whether any increase in emissions is being requested as SSM emissions or will instead be handled as a separate Construction Scenario (with corresponding emission limits and conditions, etc.

N/A

## **Air Dispersion Modeling**

- Minor Source Construction (20.2.72 NMAC) and Prevention of Significant Deterioration (PSD) (20.2.74 NMAC) ambient impact analysis (modeling): Provide an ambient impact analysis as required at 20.2.72.203.A(4) and/or 20.2.74.303 NMAC and as outlined in the Air Quality Bureau's Dispersion Modeling Guidelines found on the Planning Section's modeling website. If air dispersion modeling has been waived for one or more pollutants, attach the AQB Modeling Section modeling waiver approval documentation.
- 2) SSM Modeling: Applicants must conduct dispersion modeling for the total short term emissions during routine or predictable startup, shutdown, or maintenance (SSM) 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 (<u>http://www.env.nm.gov/aqb/permit/app\_form.html</u>) for more detailed instructions on SSM emissions modeling requirements.
- 3) Title V (20.2.70 NMAC) ambient impact analysis: Title V applications must specify the construction permit and/or Title V Permit number(s) for which air quality dispersion modeling was last approved. Facilities that have only a Title V permit, such as landfills and air curtain incinerators, are subject to the same modeling required for preconstruction permits required by 20.2.72 and 20.2.74 NMAC.

What is the purpose of this application?	Enter an X for each purpose that applies
New PSD major source or PSD major modification (20.2.74 NMAC). See #1 above.	
New Minor Source or significant permit revision under 20.2.72 NMAC (20.2.72.219.D NMAC).	Х
See #1 above. Note: Neither modeling nor a modeling waiver is required for VOC emissions.	
Reporting existing pollutants that were not previously reported.	
Reporting existing pollutants where the ambient impact is being addressed for the first time.	
Title V application (new, renewal, significant, or minor modification. 20.2.70 NMAC). See #3 above.	
Relocation (20.2.72.202.B.4 or 72.202.D.3.c NMAC)	
Minor Source Technical Permit Revision 20.2.72.219.B.1.d.vi NMAC for like-kind unit replacements.	
Other: i.e. SSM modeling. See #2 above.	
This application does not require modeling since this is a No Permit Required (NPR) application.	
This application does not require modeling since this is a Notice of Intent (NOI) application (20.2.73 NMAC).	
This application does not require modeling according to 20.2.70.7.E(11), 20.2.72.203.A(4), 20.2.74.303, 20.2.79.109.D NMAC and in accordance with the Air Quality Bureau's Modeling Guidelines.	

### Check each box that applies:

- □ See attached, approved modeling **waiver for all** pollutants from the facility.
- See attached, approved modeling **waiver for some** pollutants from the facility.
- Attached in Universal Application Form 4 (UA4) is a **modeling report for all** pollutants from the facility.
- Attached in UA4 is a **modeling report for some** pollutants from the facility.
- No modeling is required.

## **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.

To save paper and to standardize the application format, delete this sentence and the samples in the Compliance Test History Table, and begin your submittal for this attachment on this page.

Unit No.	Test Description	Test Date
VLL1EG-N1	Tested in accordance with EPA test methods for NOx and CO as required by NSR permit 7026-M4.	6/13/2019
VLL1EG-1, VLL1EG-5, VLL1EG-10	Tested in accordance with EPA test methods for NOx and CO as required by NSR permit 7026-M4.	8/15/2019- 8/16/2019; 8/22/2019
VLL1EG-8, VLL1EG-9, VLL1EG- 10, VLL2EG-1, VLL2EG-2, VLL2EG-3	Tested in accordance with EPA test methods for NOx and CO as required by NSR permit 7026-M4.	12/16/2019 – 12/18/2019
VLL1EG-8, VLL1EG-9, VLL1EG- 10, VLL1EG-2R, VLL2EG-1, VLL2EG-2, VLL2EG-1R, VLL2EG- 3	Tested in accordance with EPA test methods for opacity as required by NSR permit 7026-M4.	12/16/2019 – 12/18/2019
VLL3EG-7, VLL3EG-8, VLL3EG-9	Tested in accordance with EPA test methods for NOx and CO as required by NSR permit 7026-M4.	11/2/2020 – 11/5/2020
VLL1EG-1, VLL1EG-7, VLL1EG- 11, VLL2EG-4, VLL2EG-5, VLL2EG-6	Tested in accordance with EPA test methods for NOx and CO as required by NSR permit 7026-M4.	11/2/2020 – 11/5//2020
VLL1EG-1, VLL1EG-7, VLL1EG- 11, VLL1EG-12, VLL2EG-4, VLL2EG-5, VLL2EG-6, VLL2EG- N1, VLL3EG-7, VLL3EG-8, VLL3EG-9, VLL3EG-2R	Tested in accordance with EPA test methods for opacity as required by NSR permit 7026-M4.	11/2/2020 – 11/6//2020
VLL1EG-1R, VLL1EG-N2, VLL2EG-1R, VLL2EG-N1, VLL3EG-1R, VLL3EG-N1	Tested in accordance with EPA test methods for NOx and CO as required by NSR permit 7026-M5.	11/1/2021- 11/5/2021
VLL1EG-1R, VLL1EG-2, VLL1EG- 3, VLL1EG-4, VLL1EG-5, VLL1EG- N2, VLL2EG-1, VLL2EG-1R, VLL2EG-2, VLL2EG-3, VLL2EG- N1, VLL2EG-N3, VLL3EG-1R, VLL3EG-2R, VLL3EG-4, VLL3EG- 5, VLL3EG-6, VLL3EG-10, VLL3EG-11, VLL3EG-N1	Tested in accordance with EPA test methods for opacity as required by NSR permit 7026-M5.	11/1/2021- 11/5/2021
VLL5EG-1	Tested in accordance with EPA test methods for NOx and CO as required by NSR permit 7026-M5.	9/2/2022

### **Compliance Test History Table**

VLL5EG-1	Tested in accordance with EPA test methods for opacity as required by NSR permit 7026-M5.	9/2/2022
VLL5EG-9	Tested in accordance with EPA test methods for NOx and CO as required by NSR permit 7026-M5.	11/18/2022
VLL5EG-9	Tested in accordance with EPA test methods for opacity as required by NSR permit 7026-M5.	11/18/2022
VLL2EG-7, VLL2EG-8, VLL2EG-9, VLL2EG-10, VLL2EG-11, VLL2EG- 12	Tested in accordance with EPA test methods for NOx and CO as required by NSR permit 7026-M5.	11/29/2022- 12/1/2022
VLL2EG-7, VLL2EG-8, VLL2EG-9, VLL2EG-10, VLL2EG-11, VLL2EG- 12, VLL3EG-1, VLL3EG-2, VLL3EG-3, VLL3EG-12, VLL3EG- N2, VLL3EG-N3, VLL3EG-N4, VLL5EG-2R, VLL5EG-7, VLL5EG- 8, VLL5EG-9, VLL5EG-10, VLL5EG-11, VLL5EG-12	Tested in accordance with EPA test methods for opacity as required by NSR permit 7026-M5.	11/29/2022- 12/1/2022
VLL1EG-1-N1, VLL1EG-1-N2, VLL1EG-1-N3, VLL1EG-1-N4, VLL2EG-N2, VLL2EG-N4	Tested in accordance with EPA test methods for NOx and CO as required by NSR permit 7026-M5.	10/24/2023- 10/26/2023
VLL1-EG2R, VLL1EG-1-N1, VLL2EG-2R, VLL2EG-N2, VLL2EG-N4, VLL3EG-1, VLL3EG- 2, VLL3EG-3, VLL4EG-1, VLL5EG- 1, VLL5EG-2, VLL5EG-6, VLL5EG- N1, VLL6EG-1, VLL6EG-2, VLL6EG-3, VLL6EG-4, VLL6-EG6, VLL6-EG7, VLL6EG-N1, VLL6EG- N3, VLL6EG-1R	Tested in accordance with EPA test methods for opacity as required by NSR permit 7026-M5.	10/24/2023- 10/26/2023
VLL1EG-A1	Tested in accordance with EPA test methods for NOx and CO as required by NSR permit 7026-M5.	12/5/2023

## **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.

N/A

## **Section 22: Certification**

Company Name: \_\_\_\_\_Greater Kudu LLC

I, \_\_\_\_\_Kathy Rushmore\_\_\_\_\_, 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 <u>H</u> day of <u>March</u>, <u>2024</u>, upon my oath or affirmation, before a notary of the State of <u>California</u>

Signature

202

Authorized Representative

Title

Kathy Rushmore Printed Name

Scribed and sworn before me on this day of day of	Scribed and sworn before me on this	A day of_	MARCH		2024
---	-------------------------------------	-----------	-------	--	------

My authorization as a notary of the State of \_\_\_\_\_\_\_\_ expires on the

2027 day of JUNE 05 63 4 224 Notary's Signature Date **David Lee** DAVID LEE COMM. # 2449228 TARY PUBLIC · CALIFORNIA Notary's Printed Name ALAMEDA COUNTY COMMISSION EXPIRES

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

### **Permitting Administrative Multi-Form**

Use for NSR administrative permit revisions (including GCPs), TV administrative amendments, TV responsible official notifications, and other submittals required by a permit condition. Refer to Section 4 for instructions, acronyms, and mailing addresses.

Mail Application To: New Mexico Environment Department Air Quality Bureau 525 Camino de los Marquez, Suite 1 Santa Fe, New Mexico, 87505



Approved Permit revisio	Completed on number:	Denied				
Reviewed by a	Reviewed by & date:					

For Department use only – Received Date:

Phone (505) 476-4300 Fax (505) 476-4375 www.env.nm.gov/aqb

### Section 1: General Information – Required for All Submittals

1	Facility Name: Greater Kudu LLC					
2	Preparer/Consultant Name:	Title: Managing Consultant, Ramboll				
3	Email: eottersburg@rambo	Phone: (206) 336-1677				
4	Address: 901 5th Ave, Suite 3900, Seattle, WA 98164					
5	Air Permit Contact: Eri Otte	Title: Managing Consultant, Ramboll				
6	Email: eottersburg@rambo	Phone: (206) 336-1677				
7	7 Address: 901 5th Ave, Suite 3900, Seattle, WA 98164					
8	Check all boxes below for wl	hich this submittal applies:	AI #: 37303 Permit #: 7026-N		Permit #: 7026-M5	
	SR Construction Permit INOI (20.2.73 NMAC)			🗆 PSD Pe	ermit (20.2.74	
(20	(20.2.72 NMAC) (Sections 2-B, 2-D)			NMAC)		
	TV Operating Permit	Notice of Exemption (20.2.72	2.202.B	🗆 Nonat	tainment Permit	
(20	.2.70 NMAC)	NMAC) (Section 2-F)		(20.2.79 )	NMAC)	

### Section 2: Details of Submittal

**Only print and submit the pages necessary for your submittal**. Print double sided head-to-toe, flip on short end (tablet). The Permit Section responds to all TV Administrative amendments and responds only to denials of NSR administrative revisions. Courier proof of delivery is required if you want confirmation that the Department received this submittal. Check the box(es) applicable to this submittal:

<u>2-A(i) & 2-A(ii): Identical Engine or Turbine</u>
 <u>Replacements</u>
 <u>2-B: Owner, Operator, and Name Changes to</u>
 <u>NOIs or Construction Permits</u>

□ <u>2-C: Ownership or Operational Control Changes</u> for Title V Permits

□ <u>2-D: Closing a Facility or Removing Units from a</u> <u>Permit or Canceling an NOI</u>

□ <u>2-E: Correct Typographical Error</u>

2-F: Reporting Exempt Equipment for Minor Construction Permits or for No Permit Required (NPR) Facilities

<u>2-G: Add Minor NSR Exempt Equipment to</u> <u>Construction Permits for PSD or Nonattainment</u> <u>Sources</u>

□ <u>2-H: Title V Responsible Official Designations</u>

2-I: Submittals to the Permit Programs Manager

Section 3: Certification – Required for All Changes

### Section 2-F: Reporting Exempt Equipment for Minor Construction Permits or for No Permit Required (NPR) Facilities

Certain equipment can be added to minor construction permits as exempt equipment under 20.2.72.202.B NMAC as an administrative permit revision. (This exemption does not apply to facilities subject to 20.2.70 NMAC (TV), 20.2.74 NMAC (PSD), or 20.2.79 NMAC Nonattainment Sources. In those cases, use Section 2-G of this form.)

Construction permit Part 72 exemptions are not the same as operating permit TV insignificant activities (20.2.70.7.Q NMAC). If you have a TV permit and want to claim <u>Title V insignificant activities</u>, they may be required to have authorization through a construction permit. Only the insignificant activities that meet the requirements of 20.2.72.202.B NMAC may be added using this form for an administrative permit revision.

The Potential to Emit (PTE) of regulated air contaminants from minor permit exempt equipment count toward the facility's total emissions under the PSD, nonattainment, and TV regulations therefore, the addition of equipment using this form could possibly result in the facility becoming PSD, Nonattainment, or TV major.

Check the box(es) to indicate if your facility has a permit or is a no permit required (NPR) facility, check the box(es) for the equipment being added, and complete the table(s), if applicable. Include attachments as required.

□ Administrative Revision: This facility has a minor construction permit as designated in Section 1 of this application. This form is being submitted to add a piece(s) of equipment that qualifies as exempt under 20.2.72.202.B NMAC.

or

⊠ Notice of Exemption: This facility does not require a 20.2.72 NMAC permit, so it is designated as a no permit required (NPR) facility. This exemption form is being submitted to record that this equipment qualifies as exempt under 20.2.72.202.B NMAC. (This exemption does not apply to (cannot be added to) NOI (20.2.73 NMAC), TV (20.2.70 NMAC), PSD (20.2.74 NMAC), or nonattainment (20.2.79 NMAC) facilities.)

AQB used to require either the Notice of Exemption Form or Exemption Application Form for these facilities. This form replaces both of those forms.

# Only fill out the information in this table if your facility is an NPR facility, we already have the information for permitted sites.

Facility Name:		Plant primary SIC Code (4 digits):				
		Plant NAICS co	ode (6 digits):			
Facility Street Address (If no facility street address, provide directions from a prominent landmark):						
Company Name:		Phone:				
Company Mailing Address:						
Air Contact:		Title:				
Email:		Phone:				
The facility is:       (distance) miles       (direction) of         (nearest New Mexico town or tribal community).	Zip Code:		County:			
Status of land (check one):						
🗆 Private 🗆 Indian/Pueblo 🗆 Federal BLM 🗆 Federal Forest Service 🗆 State Land 🗆 Bernalillo County						

### Section 2-F: Reporting Exempt Equipment for Minor Construction Permits or for No Permit Required (NPR) Facilities, continued

### Minor Construction Permit (Part 72) or NPR Exempt Equipment

The equipment checked in this section meets the requirements of the exemption in 20.2.72.202 NMAC, will comply with all applicable federal requirements in 40 CFR Part 60 (NSPS) or 40 CFR Part 63 (MACT), and appropriate records will be created and retained for two (2) years (or five (5) years if a TV source):

### **Standby Generators**

Standby generators which are operated only during the unavoidable loss of commercial utility power and less than 500 hours per year. (20.2.72.202.B(3) NMAC). Potentially applicable federal regulations: 40 CFR 63 Subpart ZZZZ and 40 CFR 60 Subparts JJJJ or IIII. Emission rates from emergency standby generators should be calculated assuming operation throughout the year (i.e., 8760 hours per year) to verify that it does not make your facility PSD, Nonattainment, or TV major.

Standby Generator Manufacturer	Serial Number	Date of Manufacture	Date of Installation <sup>1</sup>	Capacity (hp)			
Group 6 Generators (2 total)	See Table 2B of the Universal Application Forms.						
Name of commercial power provider <sup>2</sup> :		PNM Resources					

<sup>1</sup> Date of installation is the date the engine is placed and secured at the location where it is intended to be operated. <sup>2</sup> Commercial power is purchased from a utility company, which specifically does not include power generated on-site for the sole purse of the user.

### **Abrasive Blasting**

□ Enclosed abrasive blasting operations; if no visible emissions from the building. (20.2.72.202.B(7) NMAC). Potentially applicable federal regulations: 40 CFR 63 Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories. More information: www.env.nm.gov/air-quality/ind-sector-info/.

### Surface Coating

□ Surface coating of equipment, including spray painting, roll coating, and painting with aerosol spray cans and all coating and clean-up solvent; if VOCs from paints and solvents do not exceed ten (10) pounds per hour and two (2) tons per year. (20.2.72.202.B(6) NMAC). Potentially applicable federal regulations (more information: <u>www.env.nm.gov/air-quality/ind-sector-info/</u>):

40 CFR 63 Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources or

40 CFR 63 Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories.

### Volatile Organic Compound (VOC) Handling and or Storage

□ VOC emissions resulting from the handling or storing of any VOC emission source; if vapor pressure is less than two tenths (0.2) PSI at the storage and handling temperatures. (20.2.72.202.B(2) NMAC).

## **Fuel Burning Equipment**

□ Fuel burning equipment used solely for heating buildings for personal comfort or producing hot water for personal use; if gaseous or liquid fuel and rated 5 MMBtu or less, or if distillate oil and 1 MMBtu or less. (20.2.72.202.B(1) NMAC).

## **Repositioning Sources at Plant**

□ Repositioning or relocating sources of air emissions or emissions points within the plant site, but only when such change in physical configuration does not increase air emissions or the ambient impacts. (20.2.72.B(4) NMAC). Attach an updated plot plan. Permittees must ensure that relocation of any emissions source within the plant site does **not** increase the ambient impact and will not result in an exceedance of any National Ambient Air Quality Standard (NAAQS), New Mexico Ambient Air Quality Standard (NMAAQS), or PSD Increment. If not sure, please contact the Modeling Section Manager (505-476-4300).

## **Emissions Exempted Based on Quantity**

 $\Box$  Any emissions unit, operation, or activity that has the potential emission rate no more than one-half (1/2) ton per year of any regulated new source review pollutant. Units, operations, or activities of similar function shall be combined when calculating the emission rate. (20.2.72.202.B(5) NMAC).

Unit Description	Serial Number	Capacity (size)	Regulated Pollutants Emitted <sup>3</sup>	PER <sup>4</sup> tpy

<sup>3</sup> Particulate Matter (PM, PM<sub>10</sub>, PM<sub>2.5</sub>); Sulfur Dioxide (SO<sub>2</sub>); Carbon Monoxide (CO); Nitrogen Dioxide (NO<sub>2</sub>); Hydrogen Sulfide (H<sub>2</sub>S); Lead (Pb); Total Reduced Sulfur; and Volatile Organic Compounds (VOC).

<sup>4</sup> Potential emission rate, as defined in 20.2.72 NMAC. The PER is the worst-case emission rate of the facility without controls or other limitations (unless the controls or limitations are enforceable) and as if the facility were operating continuously 8760 hours per year (24 hour/day, 365 days/year).

## Section 3: Certification – Required for All Submittals

Company Name: <u>Greater Kudu LLC</u>

I, <u>Kathy Rushmore</u>, 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 14 day of March	, 2021, upon my oath or affirmation, before a
notary of the State of <u>California</u> Kathy Rumar Signature <sup>1</sup>	3/14/24 Date
Kathy Rushmore Printed Name	Authorized Representative. Title
Scribed and sworn before me on this $\_\_14\_$ day My authorization as a notary of the State of $\_CA$	7
OS day of JUNE, 202	
Notary's Signature	03/14/2024 Date
David Lee Notary's Printed Name	DAVID LEE COMM. # 2449228 NOTARY PUBLIC • CALIFORNIA ALAMEDA COUNTY MY COMMISSION EXPIRES JUNE 5, 2027

<sup>1</sup> For Title V applications, the signature must be of the Responsible Official as defined in 20.2.70.7.AE NMAC:

**Appendix 3** Detailed Emissions Calculations

PURSUANT TO A CLAIM OF CONFIDENTIALITY, INFORMATION IN THIS APPENDIX HAS BEEN REDACTED BY THE APPLICANT BY BLACKING IT OUT.

Greater Kudu - Los Lunas, NM

#### **Facility-Wide Potential Emissions**

Pollutant	Diesel-Fired Emergency Generators (tpy)	Diesel Belly Tanks (tpy)	Facility-Wide Potential Emissions (tpy)	Title V Major Source Threshold (tpy)	Above Threshold?
NO <sub>X</sub>	99.9	-	99.9	100	No
СО	99.9	-	99.9	100	No
VOC	21.9	0.4	22.3	100	No
PM (Filterable)	22.2	-	22.2	100	No
PM <sub>10</sub>	22.4	-	22.4	100	No
PM <sub>2.5</sub>	22.4	-	22.4	100	No
SO <sub>2</sub>	0.12	-	0.12	100	No
Max. Individual HAP	0.06	-	0.06	10	No
Total HAP	0.13	-	0.13	25	No
CO <sub>2</sub> e	13,375	-	13,375	N/A	N/A

1. Greater Kudu will continue to comply with a site-wide  $NO_x$  and CO emissions limitation of 99.9 tpy.

2. Greater Kudu will also install and operate two diesel-fired fire water pumps, which are exempt from permitting per 20.2.72.202.A(4) NMAC, and will continue to remain below permitted limits for  $NO_x$  and CO.



#### Number of Generator Engines

Group 1 Engines	32
Group 2 Engines	2
Group 3 Engines	2
Group 4 Engines	19
(original configuration)	19
Group 4 Engines	4
(stack extensions)	4
Group 5 Engines	57
Group 6 Engines	2

#### Power Output by Load

Engine Group		Power C	Dutput (bkW/e	engine) <sup>1</sup>			Power Output (bhp/engine) <sup>1</sup>			
Engine Group	100% Load	75% Load	50% Load	25% Load	10% Load	100% Load	75% Load	50% Load	25% Load	10% L
Group 1 Engines										
Group 2 Engines										
Group 3 Engines										
Group 4 & 5 Engines										
Group 6 Engines										

Notes:

1. Per the manufacturer specification sheets for each engine model. Power outputs for Group 3, Group 4, and Group 5 were not available at 10% load. Group 3 power output at 10% load was assumed to be equal to the power output at 25% load. Groups 4, 5, and 6 power outputs at 10% load were assumed to be 10% of the power output at 100% load.

#### Fuel Usage & Heat Input by Load

Engine Group	Diesel Fuel Consumption (gal/hr/engine) <sup>1</sup> Heat						Heat I	t Input (MMBtu/hr/engine) <sup>2</sup>		
Eligine Group	100% Load	75% Load	50% Load	25% Load	10% Load	100% Load	75% Load	50% Load	25% Load	10% L
Group 1 Engines										
Group 2 Engines										
Group 3 Engines										
Group 4 & 5 Engines										
Group 6 Engines										

Notes:

1. Per the manufacturer specification sheets for each engine model. Where data was not available from the manufacturer, the fuel consumption was estimated based on the following equation:

Fuel Consumption at X% Load (gal/hr) = Fuel Consumption at 100% Load (gal/hr) x X% Load \* Safety Factor (1.05)

3. All generators will be fueled by diesel fuel and/or renewable diesel fuel conforming to ASTM D975 specification for petroleum [including hydrotreated vegetable oil (HVO)]; the ISO8178 D2 test cycle emission rates are the same for both diesel fuel and HVO. For simplicity and conservative purposes, Greater Kudu has calculated total potential emissions from all generators based on the diesel fuel load-specific emission factors.









### Manufacturer-Provided Emission Factors by Load (Uncontrolled)

Pollutant	Emi	ssion Factors	for Group 1 En	gines (g/bkW	h) <sup>1</sup>	Emission Factors for Group 2 Engines (g/bkWh) <sup>1</sup>				
ronatant	100% Load	75% Load	50% Load	25% Load	10% Load	100% Load	75% Load	50% Load	25% Load	10%
NO <sub>X</sub>										
CO										
VOC <sup>2</sup>										
Filterable PM <sup>3</sup>										

Pollutant	Emi	ssion Factors	for Group 3 En	gines (g/bhp-	hr) <sup>1</sup>	Emission Factors for Group 4 Engines (g/bhp-hr) <sup>1</sup>				
Fondtant	100% Load	75% Load	50% Load	25% Load	10% Load	100% Load	75% Load	50% Load	25% Load	10%
NO <sub>X</sub>										
СО										
VOC <sup>2</sup>										
Filterable PM <sup>3</sup>										

Pollutant	Emission Fac	tors for Group	4 Engines wit hr) <sup>1</sup>	h Stack Extens	sions (g/bhp-	E	mission Facto	rs for Group 5 Ei	ngines (g/bhp-hi	r) 1
	100% Load	75% Load	50% Load	25% Load	10% Load	100% Load	75% Load	50% Load	25% Load	10% L
NO <sub>X</sub>										
СО										
VOC <sup>2</sup>										
Filterable PM <sup>3</sup>										

Pollutant	Emission Factors for Group 6 Engines (g/bhp-hr) <sup>1</sup>							
Fondtant	100% Load	75% Load	50% Load	25% Load	10% Load			
NO <sub>X</sub>								
CO VOC <sup>2</sup>								
VOC <sup>2</sup>								
Filterable PM <sup>3</sup>								

#### Notes:

1. Per the manufacturer emissions data and specification sheets for each engine type. Group 1 and Group 2 calculations conservatively rely on the manufacturer's "Not-to-Exceed" emissions data. "Not-to-Exceed" emissions data. "Not-to-Exceed" emissions data was not available for Group 3, Group 4, Group 5, and Group 6 engines. As such, emissions for Group 3, Group 4, Group 5, and Group 6 engines are reported as equal to the manufacturer's nominal emission rates with pollutant-specific safety factors applied. Based on guidance from the manufacturer, a 5% increase was applied to the filterable PM emission factors for the Group 4 engines with stack extensions.



2. It is conservatively assumed that all hydrocarbons (HC) are VOC.

3. It is conservatively assumed that all PM is less than 2.5 microns in diameter.





#### **AP-42 Emission Factors**

Pollutant	Emission Factor <sup>1</sup> (Ib/MMBtu)
Condensable PM	7.70E-03
SO <sub>2</sub> <sup>2</sup>	1.52E-03
Benzene	7.76E-04
Toluene	2.81E-04
Xylenes	1.93E-04
Formaldehyde	7.89E-05
Acetaldehyde	2.52E-05
Acrolein	7.88E-06
Total PAH <sup>3</sup>	2.12E-04
Total HAP	1.57E-03

#### Notes:

1. Emission factors are based on the USEPA's AP-42, Section 3.4, *Large Stationary Diesel and All Stationary Dual-fuel Engines,* Tables 3.4-1, 3.4-3, and 3.4-4 (October 1996).

2. The  $SO_2$  emission factor was calculated based on the maximum allowable diesel fuel sulfur content under NSPS Subpart IIII:

Diesel %S Content = 0.0015 wt% sulfur

3. Total PAH = Total Polycyclic Aromatic Hydrocarbons

#### Greenhouse Gases (GHG) Emission Factors

Pollutant	Emission Factor <sup>1</sup> (Ib/MMBtu)
CO <sub>2</sub>	163.05
CH <sub>4</sub>	6.61E-03
N <sub>2</sub> O	1.32E-03
CO <sub>2</sub> e <sup>2</sup>	163.61

Notes:

1. Per 40 CFR 98, Subpart C, Tables C-1 and C-2 for No. 2 fuel oil combustion. The emission factors were converted from kg/MMBtu to lb/MMBtu.

2. The  $CO_2e$  emission factor is calculated as the sum of each GHG pollutant multiplied by its global warming potential, per 40 CFR 98, Subpart A, Table A-1:

$CO_2$ :	1
$CH_4$ :	25
$N_2O$ :	298

## PUBLIC

RAMBOLL

# Generator Emissions Calculations

Greater Kudu - Los Lunas, NM

Dellutent		<b>Hourly Emissi</b>	ons for Group	1 Engines (lb/	hr/engine) <sup>1,2</sup>		Hourly Emissions for Group 2 Engines (lb/hr/engine) <sup>1, 2</sup>					
Pollutant	100% Load	75% Load	50% Load	25% Load	10% Load	Maximum	100% Load	75% Load	25% Load	10% Load	Maximum	
<u>Criteria Pollutants</u>												
NO <sub>X</sub>	81.01	42.82	24.31	12.35	11.57	81.01	71.88	31.71	17.22	8.76	12.38	71.88
CO	12.63	8.68	8.10	8.87	6.94	12.63	9.06	9.97	5.74	9.67	11.54	11.54
VOC	4.01	1.22	1.39	1.14	2.46	4.01	2.60	1.63	1.63	1.80	2.72	2.72
Filterable PM	0.59	0.69	1.00	1.04	2.58	2.58	3.08	2.63	0.85	0.06	0.47	3.08
PM <sub>10</sub> /PM <sub>2.5</sub>	0.81	0.86	1.12	1.10	2.60	2.60	3.26	2.77	0.95	0.11	0.48	3.26
SO <sub>2</sub>	0.04	0.03	0.02	0.01	4.51E-03	0.04	0.03	0.03	0.02	9.16E-03	3.66E-03	0.03
Hazardous Air Pollutants												
Benzene	0.02	0.02	0.01	5.78E-03	2.31E-03	0.02	0.02	0.01	0.01	4.69E-03	1.88E-03	0.02
Toluene	7.97E-03	6.05E-03	4.20E-03	2.09E-03	8.37E-04	7.97E-03	6.47E-03	5.16E-03	3.70E-03	1.70E-03	6.79E-04	6.47E-03
Xylenes	5.47E-03	4.15E-03	2.88E-03	1.44E-03	5.75E-04	5.47E-03	4.44E-03	3.54E-03	2.54E-03	1.17E-03	4.67E-04	4.44E-03
Formaldehyde	2.24E-03	1.70E-03	1.18E-03	5.87E-04	2.35E-04	2.24E-03	1.82E-03	1.45E-03	1.04E-03	4.77E-04	1.91E-04	1.82E-03
Acetaldehyde	7.15E-04	5.42E-04	3.76E-04	1.88E-04	7.51E-05	7.15E-04	5.80E-04	4.63E-04	3.32E-04	1.52E-04	6.09E-05	5.80E-04
Acrolein	2.24E-04	1.70E-04	1.18E-04	5.87E-05	2.35E-05	2.24E-04	1.81E-04	1.45E-04	1.04E-04	4.76E-05	1.90E-05	1.81E-04
Total PAH	6.01E-03	4.56E-03	3.17E-03	1.58E-03	6.31E-04	6.01E-03	4.88E-03	3.89E-03	2.79E-03	1.28E-03	5.12E-04	4.88E-03
Total HAP	0.04	0.03	0.02	0.01	4.69E-03	0.04	0.04	0.03	0.02	9.51E-03	3.80E-03	0.04
<u>Greenhouse Gases</u>												
CO <sub>2</sub>	4,625	3,508	2,435	1,214	485.63	4,625	3,754	2,994	2,145	985.34	394.14	3,754
CH4	0.19	0.14	0.10	0.05	0.02	0.19	0.15	0.12	0.09	0.04	0.02	0.15
N <sub>2</sub> O	0.04	0.03	0.02	9.85E-03	3.94E-03	0.04	0.03	0.02	0.02	7.99E-03	3.20E-03	0.03
CO <sub>2</sub> e	4,641	3,520	2,444	1,218	487.30	4,641	3,767	3,004	2,152	988.72	395.49	3,767

## Hourly Emissions per Engine by Load - Group 1 and Group 2 Engines

Notes:
1. For manufacturer-provided emission factors:
Hourly Emissions at X% Load (lb/hr/engine) = Emission Factor at X% Load (g/kWh) × Engine Power Output at X% Load (bkW/engine) / (453.6 g/lb)

2. For AP-42 & GHG emission factors: Hourly Emissions at X% Load (lb/hr/engine) = Emission Factor (lb/MMBtu) × Heat Input at X% Load (MMBtu/hr)



# **Generator Emissions Calculations**

Greater Kudu - Los Lunas, NI	Ч
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Dellutent		<b>Hourly Emissi</b>	ons for Group	3 Engines (lb/	hr/engine) <sup>1,2</sup>		Hourly Emissions for Group 4 Engines (lb/hr/engine) <sup>1, 2</sup>					
Pollutant	100% Load	75% Load	50% Load	25% Load	10% Load	Maximum	100% Load	75% Load	50% Load	25% Load	10% Load	Maximum
<u>Criteria Pollutants</u>												
NO <sub>X</sub>	16.78	12.33	11.04	4.43	4.43	16.78	64.56	39.47	20.61	11.39	4.25	64.56
СО	4.31	2.35	1.18	1.08	1.08	4.31	3.99	2.01	2.24	2.34	0.87	3.99
VOC	0.39	0.33	0.28	0.17	0.17	0.39	1.13	1.22	1.49	1.30	0.48	1.49
Filterable PM	0.90	0.74	0.61	0.39	0.39	0.90	1.07	1.04	1.22	1.32	0.49	1.32
PM <sub>10</sub> /PM <sub>2.5</sub>	0.97	0.79	0.65	0.41	0.40	0.97	1.29	1.21	1.34	1.39	0.51	1.39
SO <sub>2</sub>	0.01	0.01	7.43E-03	3.97E-03	1.57E-03	0.01	0.04	0.03	0.02	0.01	4.53E-03	0.04
Hazardous Air Pollutants												
Benzene	7.68E-03	5.75E-03	3.81E-03	2.03E-03	8.06E-04	7.68E-03	0.02	0.02	0.01	7.23E-03	2.32E-03	0.02
Toluene	2.78E-03	2.08E-03	1.38E-03	7.35E-04	2.92E-04	2.78E-03	8.01E-03	6.16E-03	4.54E-03	2.62E-03	8.41E-04	8.01E-03
Xylenes	1.91E-03	1.43E-03	9.47E-04	5.05E-04	2.00E-04	1.91E-03	5.50E-03	4.23E-03	3.12E-03	1.80E-03	5.78E-04	5.50E-03
Formaldehyde	7.81E-04	5.85E-04	3.87E-04	2.07E-04	8.20E-05	7.81E-04	2.25E-03	1.73E-03	1.28E-03	7.35E-04	2.36E-04	2.25E-03
Acetaldehyde	2.49E-04	1.87E-04	1.24E-04	6.60E-05	2.62E-05	2.49E-04	7.18E-04	5.53E-04	4.07E-04	2.35E-04	7.54E-05	7.18E-04
Acrolein	7.80E-05	5.84E-05	3.87E-05	2.06E-05	8.19E-06	7.80E-05	2.25E-04	1.73E-04	1.27E-04	7.34E-05	2.36E-05	2.25E-04
Total PAH	2.10E-03	1.57E-03	1.04E-03	5.55E-04	2.20E-04	2.10E-03	6.04E-03	4.65E-03	3.43E-03	1.98E-03	6.34E-04	6.04E-03
Total HAP	0.02	0.01	7.72E-03	4.12E-03	1.64E-03	0.02	0.04	0.03	0.03	0.01	4.71E-03	0.04
<u>Greenhouse Gases</u>												
CO <sub>2</sub>	1,613	1,209	799.89	426.76	169.38	1,613	4,647	3,575	2,637	1,519	487.98	4,647
CH <sub>4</sub>	0.07	0.05	0.03	0.02	6.87E-03	0.07	0.19	0.15	0.11	0.06	0.02	0.19
N <sub>2</sub> O	0.01	9.81E-03	6.49E-03	3.46E-03	1.37E-03	0.01	0.04	0.03	0.02	0.01	3.96E-03	0.04
CO <sub>2</sub> e	1,619	1,213	802.63	428.22	169.97	1,619	4,663	3,587	2,646	1,525	489.65	4,663

## Hourly Emissions per Engine by Load - Group 3 and Group 4 Engines

Notes:

1. For manufacturer-provided emission factors:

Hourly Emissions at X% Load (lb/hr/engine) = Emission Factor at X% Load (g/kWh) × Engine Power Output at X% Load (bkW/engine) / (453.6 g/lb) 

Hourly Emissions at X% Load (lb/hr/engine) = Emission Factor at X% Load (g/bhp-hr) × Engine Power Output at X% Load (bhp/engine) / (453.6 g/lb)

2. For AP-42 & GHG emission factors: Hourly Emissions at X% Load (lb/hr/engine) = Emission Factor (lb/MMBtu) × Heat Input at X% Load (MMBtu/hr)



#### Hourly Emissions per Engine by Load - Group 4 Engines with Stack Extensions and Group 5 Engines

Dellustent	Hourly E	missions for G	roup 4 Engines	s with Extensio	ons (lb/hr/eng	ine) <sup>1, 2, 3</sup>	Hourly Emissions for Group 5 Engines (lb/hr/engine) <sup>1, 2, 3</sup>					
Pollutant	100% Load	75% Load	50% Load	25% Load	10% Load	Maximum	100% Load	75% Load	50% Load	25% Load	10% Load	Maximum
<u>Criteria Pollutants</u>												
NO <sub>X</sub>	64.56	39.47	20.61	11.39	4.25	64.56			6.46			6.46
СО	3.99	2.01	2.24	2.34	0.87	3.99	3.99	2.01	2.24	2.34	0.87	3.99
VOC	1.13	1.22	1.49	1.30	0.48	1.49	1.13	1.22	1.49	1.30	0.48	1.49
Filterable PM	1.12	1.09	1.28	1.38	0.52	1.38	1.07	1.04	1.22	1.32	0.49	1.32
PM <sub>10</sub> /PM <sub>2.5</sub>	1.34	1.26	1.40	1.46	0.54	1.46	1.29	1.21	1.34	1.39	0.51	1.39
SO <sub>2</sub>	0.04	0.03	0.02	0.01	4.53E-03	0.04	0.04	0.03	0.02	0.01	4.53E-03	0.04
Hazardous Air Pollutants			•							·		
Benzene	0.02	0.02	0.01	7.23E-03	2.32E-03	0.02	0.02	0.02	0.01	7.23E-03	2.32E-03	0.02
Toluene	8.01E-03	6.16E-03	4.54E-03	2.62E-03	8.41E-04	8.01E-03	8.01E-03	6.16E-03	4.54E-03	2.62E-03	8.41E-04	8.01E-03
Xylenes	5.50E-03	4.23E-03	3.12E-03	1.80E-03	5.78E-04	5.50E-03	5.50E-03	4.23E-03	3.12E-03	1.80E-03	5.78E-04	5.50E-03
Formaldehyde	2.25E-03	1.73E-03	1.28E-03	7.35E-04	2.36E-04	2.25E-03	2.25E-03	1.73E-03	1.28E-03	7.35E-04	2.36E-04	2.25E-03
Acetaldehyde	7.18E-04	5.53E-04	4.07E-04	2.35E-04	7.54E-05	7.18E-04	7.18E-04	5.53E-04	4.07E-04	2.35E-04	7.54E-05	7.18E-04
Acrolein	2.25E-04	1.73E-04	1.27E-04	7.34E-05	2.36E-05	2.25E-04	2.25E-04	1.73E-04	1.27E-04	7.34E-05	2.36E-05	2.25E-04
Total PAH	6.04E-03	4.65E-03	3.43E-03	1.98E-03	6.34E-04	6.04E-03	6.04E-03	4.65E-03	3.43E-03	1.98E-03	6.34E-04	6.04E-03
Total HAP	0.04	0.03	0.03	0.01	4.71E-03	0.04	0.04	0.03	0.03	0.01	4.71E-03	0.04
<u>Greenhouse Gases</u>												
CO <sub>2</sub>	4,647	3,575	2,637	1,519	487.98	4,647	4,647	3,575	2,637	1,519	487.98	4,647
CH <sub>4</sub>	0.19	0.15	0.11	0.06	0.02	0.19	0.19	0.15	0.11	0.06	0.02	0.19
N <sub>2</sub> O	0.04	0.03	0.02	0.01	3.96E-03	0.04	0.04	0.03	0.02	0.01	3.96E-03	0.04
CO <sub>2</sub> e	4,663	3,587	2,646	1,525	489.65	4,663	4,663	3,587	2,646	1,525	489.65	4,663

Notes:

1. For manufacturer-provided emission factors:

Hourly Emissions at X% Load (lb/hr/engine) = Emission Factor at X% Load (g/bhp-hr) × Engine Power Output at X% Load (bhp/engine) / (453.6 g/lb)

2. For AP-42 & GHG emission factors: Hourly Emissions at X% Load (lb/hr/engine) = Emission Factor (lb/MMBtu) × Heat Input at X% Load (MMBtu/hr)

3. For generators equipped with SCR control for NO<sub>X</sub> emissions (Group 5 engines), the potential NO<sub>X</sub> emissions were estimated using the manufacturer-provided NO<sub>X</sub> emission factor at 100% load and the SCR control efficiency. It was conservatively assumed that the emissions at all other loads (i.e., 75% load, 50% load, 25% load, and 10% load) are equivalent to the emissions at 100% load.

90% = SCR Control Efficiency for  $NO_X$ 



#### Hourly Emissions per Engine by Load - Group 6 Engines

Pollutant	Uncon	trolled Hourly	<b>Emissions for</b>	Group 6 Engin	es (lb/hr/eng	ine) <sup>1, 2</sup>	Controlled Hourly Emissions for Group 6 Engines (lb/hr/engine) <sup>1, 2, 3</sup>					
Pollutant	100% Load	75% Load	50% Load		10% Load	Maximum	100% Load	75% Load	50% Load	25% Load	10% Load	Maximum
<u>Criteria Pollutants</u>												
NO <sub>X</sub>	63.65	35.23	20.37	9.92	3.97	63.65			6.37			6.37
СО	12.04	7.59	4.26	3.25	1.30	12.04	12.04	7.59	4.26	3.25	1.30	12.04
VOC	0.55	0.61	0.55	0.55	0.22	0.61	0.55	0.61	0.55	0.55	0.22	0.61
Filterable PM	2.01	1.51	1.00	0.90	0.36	2.01	2.01	1.51	1.00	0.90	0.36	2.01
PM <sub>10</sub> /PM <sub>2.5</sub>	2.18	1.63	1.09	0.96	0.38	2.18	2.18	1.63	1.09	0.96	0.38	2.18
SO <sub>2</sub>	0.03	0.03	0.02	0.01	3.60E-03	0.03	0.03	0.03	0.02	0.01	3.60E-03	0.03
Hazardous Air Pollutants												
Benzene	0.02	0.01	9.14E-03	5.85E-03	1.84E-03	0.02	0.02	0.01	9.14E-03	5.85E-03	1.84E-03	0.02
Toluene	6.36E-03	4.67E-03	3.31E-03	2.12E-03	6.68E-04	6.36E-03	6.36E-03	4.67E-03	3.31E-03	2.12E-03	6.68E-04	6.36E-03
Xylenes	4.37E-03	3.21E-03	2.27E-03	1.45E-03	4.59E-04	4.37E-03	4.37E-03	3.21E-03	2.27E-03	1.45E-03	4.59E-04	4.37E-03
Formaldehyde	1.79E-03	1.31E-03	9.30E-04	5.95E-04	1.88E-04	1.79E-03	1.79E-03	1.31E-03	9.30E-04	5.95E-04	1.88E-04	1.79E-03
Acetaldehyde	5.70E-04	4.19E-04	2.97E-04	1.90E-04	5.99E-05	5.70E-04	5.70E-04	4.19E-04	2.97E-04	1.90E-04	5.99E-05	5.70E-04
Acrolein	1.78E-04	1.31E-04	9.29E-05	5.94E-05	1.87E-05	1.78E-04	1.78E-04	1.31E-04	9.29E-05	5.94E-05	1.87E-05	1.78E-04
Total PAH	4.80E-03	3.53E-03	2.50E-03	1.60E-03	5.04E-04	4.80E-03	4.80E-03	3.53E-03	2.50E-03	1.60E-03	5.04E-04	4.80E-03
Total HAP	0.04	0.03	0.02	0.01	3.74E-03	0.04	0.04	0.03	0.02	0.01	3.74E-03	0.04
<u>Greenhouse Gases</u>												
CO <sub>2</sub>	3,691	2,712	1,922	1,229	387.57	3,691	3,691	2,712	1,922	1,229	387.57	3,691
CH <sub>4</sub>	0.15	0.11	0.08	0.05	0.02	0.15	0.15	0.11	0.08	0.05	0.02	0.15
N <sub>2</sub> O	0.03	0.02	0.02	9.97E-03	3.14E-03	0.03	0.03	0.02	0.02	9.97E-03	3.14E-03	0.03
CO <sub>2</sub> e	3,704	2,722	1,928	1,233	388.90	3,704	3,704	2,722	1,928	1,233	388.90	3,704

Notes:

1. For manufacturer-provided emission factors:

90%

2. For AP-42 & GHG emission factors: Hourly Emissions at X% Load (lb/hr/engine) = Emission Factor (lb/MMBtu) × Heat Input at X% Load (MMBtu/hr)

3. For generators equipped with SCR control for NO<sub>X</sub> emissions (Group 6 engines), the potential NO<sub>X</sub> emissions were estimated using the manufacturer-provided NO<sub>X</sub> emission factor at 100% load and the SCR control efficiency. It was conservatively assumed that the emissions at all other loads (i.e., 75% load, 50% load, 25% load, and 10% load) are equivalent to the emissions at 100% load.

= SCR Control Efficiency for NO<sub>X</sub>



#### Group 1 Engines - Ratio of (Pounds of Pollutant Emissions) / Group 2 Engines - Ratio of (Pounds of Pollutant Emissions) / (Pounds of NO<sub>x</sub> Emissions) (Pounds of NO<sub>x</sub> Emissions) Pollutant 100% Load 75% Load 50% Load 25% Load 10% Load 100% Load 75% Load 50% Load 25% Load 10% Criteria Pollutants NOX ------------------\_ CO ------------------VOC 0.05 0.03 0.06 0.09 0.21 0.04 0.05 0.09 0.21 0.2 Filterable PM 0.01 0.02 0.04 0.08 0.22 0.04 0.08 0.05 0.01 0.0 $PM_{10}/PM_{2.5}$ 0.01 0.02 0.05 0.09 0.22 0.05 0.09 0.06 0.01 0.0 9.31E-04 2.96 $SO_2$ 5.30E-04 7.61E-04 9.14E-04 3.90E-04 4.85E-04 8.77E-04 1.16E-03 1.05E-03 Hazardous Air Pollutants 2.72E-04 3.90E-04 4.77E-04 4.68E-04 2.00E-04 2.49E-04 4.49E-04 5.93E-04 5.35E-04 1.51 Benzene Toluene 9.84E-05 1.41E-04 1.73E-04 1.69E-04 7.23E-05 9.00E-05 1.63E-04 2.15E-04 1.94E-04 5.49 6.76E-05 Xylenes 9.70E-05 1.19E-04 1.16E-04 4.97E-05 6.18E-05 1.12E-04 1.47E-04 1.33E-04 3.77 2.76E-05 3.96E-05 4.85E-05 4.76E-05 2.03E-05 2.53E-05 4.57E-05 6.03E-05 5.44E-05 1.54 Formaldehyde 4.92 1.55E-05 8.82E-06 1.27E-05 1.52E-05 6.48E-06 8.07E-06 1.46E-05 1.93E-05 1.74E-05 Acetaldehyde 5.44E-06 2.76E-06 3.96E-06 4.84E-06 4.75E-06 2.03E-06 2.52E-06 4.56E-06 6.02E-06 Acrolein Total PAH 1.07E-04 1.30E-04 1.28E-04 6.79E-05 1.23E-04 1.62E-04 1.46E-04 4.14 7.42E-05 5.46E-05 Total HAP 5.51E-04 7.91E-04 9.67E-04 9.49E-04 4.05E-04 5.04E-04 9.11E-04 1.20E-03 1.09E-03 3.07 Greenhouse Gases $CO_2$ 57.09 81.91 100.20 98.34 41.96 52.22 94.41 124.59 112.49 31. $CH_4$ 2.32E-03 1.29 3.32E-03 4.06E-03 3.99E-03 1.70E-03 2.12E-03 3.83E-03 5.05E-03 4.56E-03 $N_2O$ 4.63E-04 6.65E-04 2.58 8.13E-04 7.98E-04 3.40E-04 4.24E-04 7.66E-04 1.01E-03 9.13E-04 CO<sub>2</sub>e 57.29 82.19 100.54 98.68 42.10 52.40 94.73 125.02 112.88 31.

Pollutant	Group 3 I	-	o of (Pounds of ds of NO <sub>x</sub> Emis	f Pollutant Emi ssions)	issions) /	Group 4 Engines - Ratio of (Pounds of Pollutant Emissions) / (Pounds of NO <sub>X</sub> Emissions) <sup>1</sup>					
	100% Load	75% Load	50% Load	25% Load	10% Load	100% Load	75% Load	50% Load	25% Load	10% L	
<u>Criteria Pollutants</u>				•							
NO <sub>X</sub>											
СО											
VOC	0.02	0.03	0.03	0.04	0.04	0.02	0.03	0.07	0.11	0.1	
Filterable PM	0.05	0.06	0.06	0.09	0.09	0.02	0.03	0.06	0.12	0.12	
PM <sub>10</sub> /PM <sub>2.5</sub>	0.06	0.06	0.06	0.09	0.09	0.02	0.03	0.07	0.13	0.13	
SO <sub>2</sub>	8.93E-04	9.11E-04	6.73E-04	8.94E-04	3.55E-04	6.69E-04	8.41E-04	1.19E-03	1.24E-03	1.07E	
Hazardous Air Pollutants				•	•				•		
Benzene	4.58E-04	4.66E-04	3.45E-04	4.58E-04	1.82E-04	3.43E-04	4.31E-04	6.09E-04	6.35E-04	5.47E	
Toluene	1.66E-04	1.69E-04	1.25E-04	1.66E-04	6.58E-05	1.24E-04	1.56E-04	2.20E-04	2.30E-04	1.98E	
Xylenes	1.14E-04	1.16E-04	8.57E-05	1.14E-04	4.52E-05	8.52E-05	1.07E-04	1.51E-04	1.58E-04	1.36E	
Formaldehyde	4.65E-05	4.74E-05	3.50E-05	4.66E-05	1.85E-05	3.48E-05	4.38E-05	6.19E-05	6.46E-05	5.56E	
Acetaldehyde	1.49E-05	1.51E-05	1.12E-05	1.49E-05	5.90E-06	1.11E-05	1.40E-05	1.98E-05	2.06E-05	1.78E	
Acrolein	4.65E-06	4.74E-06	3.50E-06	4.65E-06	1.85E-06	3.48E-06	4.38E-06	6.18E-06	6.45E-06	5.55E	
Total PAH	1.25E-04	1.27E-04	9.42E-05	1.25E-04	4.97E-05	9.36E-05	1.18E-04	1.66E-04	1.73E-04	1.49E	
Total HAP	9.28E-04	9.46E-04	6.99E-04	9.29E-04	3.69E-04	6.95E-04	8.74E-04	1.23E-03	1.29E-03	1.11E	
<u>Greenhouse Gases</u>											
CO <sub>2</sub>	96.15	98.01	72.43	96.25	38.20	71.99	90.57	127.92	133.43	114.9	
CH <sub>4</sub>	3.90E-03	3.98E-03	2.94E-03	3.90E-03	1.55E-03	2.92E-03	3.67E-03	5.19E-03	5.41E-03	4.66E	
N <sub>2</sub> O	7.80E-04	7.95E-04	5.88E-04	7.81E-04	3.10E-04	5.84E-04	7.35E-04	1.04E-03	1.08E-03	9.32E	
CO <sub>2</sub> e	96.48	98.34	72.68	96.58	38.33	72.23	90.88	128.36	133.88	115.3	

### Ratio of Pollutant Emissions to $\mathrm{NO}_{\mathrm{X}}$ Emissions by Load

Load
-
-
22
04
04
E-04
E-04
E-05
E-05
E-05
E-06
E-05 E-05 E-06 E-06 E-06 E-05
E-05
E-04
.83
E-03
E-04
.94

Load
-
-
11 12
12
13
E-03
E-04
E-04 E-04 E-04
E-04
E-05
E-05 E-05 E-06
E-06
E-04 E-03
E-03
.92
E-03
E-04
.31



Pollutant	Group 6 E	(Pound	of (Pounds of s of NO <sub>x</sub> Emiss	Maximum Ratio of Pollutant Emissions to NO <sub>x</sub> Emissions		
	100% Load	75% Load	50% Load	25% Load	10% Load	(lb pollutant/lb NO <sub>x</sub> ) <sup>1</sup>
<u>Criteria Pollutants</u>						
NO <sub>X</sub>						
СО						
VOC	0.01	0.02	0.03	0.06	0.06	0.22
Filterable PM	0.03	0.04	0.05	0.09	0.09	0.22
PM <sub>10</sub> /PM <sub>2.5</sub>	0.03	0.05	0.05	0.10	0.10	0.22
SO <sub>2</sub>	5.39E-04	7.15E-04	8.77E-04	1.15E-03	9.08E-04	1.24E-03
Hazardous Air Pollutants						
Benzene	2.76E-04	3.66E-04	4.49E-04	5.89E-04	4.65E-04	6.35E-04
Toluene	9.99E-05	1.33E-04	1.63E-04	2.13E-04	1.68E-04	2.30E-04
Xylenes	6.86E-05	9.11E-05	1.12E-04	1.47E-04	1.16E-04	1.58E-04
Formaldehyde	2.81E-05	3.73E-05	4.57E-05	5.99E-05	4.73E-05	6.46E-05
Acetaldehyde	8.96E-06	1.19E-05	1.46E-05	1.91E-05	1.51E-05	2.06E-05
Acrolein	2.80E-06	3.72E-06	4.56E-06	5.99E-06	4.72E-06	6.45E-06
Total PAH	7.54E-05	1.00E-04	1.23E-04	1.61E-04	1.27E-04	1.73E-04
Total HAP	5.60E-04	7.43E-04	9.11E-04	1.20E-03	9.43E-04	1.29E-03
Greenhouse Gases						
CO <sub>2</sub>	57.99	76.98	94.35	123.86	97.74	133.43
CH <sub>4</sub>	2.35E-03	3.12E-03	3.83E-03	5.02E-03	3.96E-03	5.41E-03
N <sub>2</sub> O	4.70E-04	6.25E-04	7.65E-04	1.00E-03	7.93E-04	1.08E-03
CO <sub>2</sub> e	58.19	77.25	94.68	124.28	98.07	133.88

Notes:

1. Greater Kudu has used a site-wide potential-to-emit (PTE) calculation approach consistent with previous submittals to NMED. The "Maximum Ratio of Pollutant Emissions to NOX Emissions" specifically excludes the ratios associated with the Group 5 engines. The Group 5 engines are the same make, model, and design rated capacity as the Group 4 engines; therefore, the ratios calculated for the Group 4 engines are reflective of expected potential emissions rates of all pollutants other than NOX from these engines. Similarly, the "Maximum Ratio of Pollutant to NOX Emissions" for the Group 6 engines are calculated based on the uncontrolled hourly emission rates to be reflective of expected potential emissions rates for all pollutants other than NOX from these engines.

## PUBLIC

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#### **Potential Annual Emissions from All Generators**

Pollutant	Total Potential Annual Emissions for All Generators <sup>1, 2, 3</sup> (tpy)					
<u>Criteria Pollutants</u>						
NO <sub>X</sub>	99.90					
CO	99.90					
VOC	21.93					
Filterable PM	22.24					
PM <sub>10</sub> /PM <sub>2.5</sub>	22.44					
SO <sub>2</sub>	0.12					
Hazardous Air Pollutants						
Benzene	0.06					
Toluene	0.02					
Xylenes	0.02					
Formaldehyde	0.01					
Acetaldehyde	0.00					
Acrolein	0.00					
Total PAH	0.02					
Total HAP	0.13					
<u>Greenhouse Gases</u>						
CO <sub>2</sub>	13,329					
CH <sub>4</sub>	0.54					
N <sub>2</sub> O	0.11					
CO <sub>2</sub> e	13,375					

#### Notes:

1. Greater Kudu will continue to comply with a site-wide  $NO_X$  and CO emissions limitation of 99.9 tpy.

2. For all pollutants other than  $NO_X$  and CO, the total potential annual emissions from all generators were calculated as follows:

Total Potential Annual Pollutant Emissions from All Generators (tpy) = Potential Annual  $NO_X$  Emissions (tpy) × Maximum Ratio of Pollutant Emissions to  $NO_X$  Emissions (lb pollutant/lb  $NO_X$ )

3. Consistent with "Note 1" above, the "Maximum Ratio of Pollutant Emissions to NO<sub>X</sub> Emissions" excludes the ratios for the Group 5 engines as expected potential emissions for pollutants other than NO<sub>X</sub> are represented by the Group 4 engine pollutant ratios.

## PUBLIC

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#### **Diesel Tanks Potential Annual Throughput**

Engine Type	Hourly Diesel Fuel Consumption per Engine <sup>1</sup> (gal/hr/engine)	Potential Hours of Operation per Engine <sup>2</sup> (hrs/yr/engine)	Potential Fuel Usage per Engine <sup>3</sup> (gal/yr/engine)
Group 1 Engines		500	
Group 2 Engines		500	
Group 3 Engines		500	
Group 4 & 5 Engines		500	
Group 6 Engines		500	

Notes:

1. Per the manufacturer's specification sheets for each engine model.

2. Based on the maximum allowable run time per engine under 20 NMAC 2.72.202(B)(3) of 500 hours.

3. Potential Fuel Usage per Engine (gal/yr/engine) = Maximum Diesel Fuel Consumption at Any Load

(gal/hr/engine) \* Potential Hours of Operation per Engine (hrs/yr/engine)



#### **Potential VOC Emissions from the Diesel Belly Tanks**

Tank Parameters	Group 1 Engines	Group 2 Engines	Group 3 Engines	Group 4 Engines	Group 5 Engines	Group 6 Engines
Belly Tank Storage Capacity (gal) <sup>1</sup>						
Working Volume (gal) <sup>2</sup>						
Potential VOC Emissions per Tank (lb/yr/engine) <sup>3</sup>	7.48	7.06	4.44	7.68	7.68	5.40
Potential VOC Emissions for All Tanks (tpy) <sup>4</sup>	1.20E-01	7.06E-03	4.44E-03	8.83E-02	2.19E-01	5.40E-03
Total Potential VOC Emissions from Diesel Belly Tanks (tpy) <sup>5</sup>	0.44					

Notes:

1. The belly tank storage capacities for Groups 1 and 2 engines reflect site-specific information. The belly tank storage capacities for Groups 3, 4, 5, and 6 engines are based on manufacturer specifications.

2. The working volume is assumed to be 80% of the storage capacity of the tank.

3. VOC emissions were estimated per the USEPA's TANKS 4.0.9.d program.

4. Potential VOC Emissions for All Tanks (tpy) = Potential VOC Emissions per Tank (lb/yr/engine) x Number of Engines / (2,000 lb/ton)

5. Total Potential VOC Emissions from Diesel Belly Tanks (tpy) = Potential VOC Emissions for All Group 1 Engine Tanks (tpy) + Potential VOC Emissions from All Group 2 Engine Tanks (tpy) + Potential VOC Emissions from All Group 3 Engine Tanks (tpy) + Potential VOC Emissions from All Group 4 Engine Tanks (tpy) + Potential VOC Emissions from All Group 5 Engine Tanks (tpy) + Potential VOC Emissions from All Group 5 Engine Tanks (tpy) + Potential VOC Emissions from All Group 5 Engine Tanks (tpy) + Potential VOC Emissions from All Group 5 Engine Tanks (tpy) + Potential VOC Emissions from All Group 5 Engine Tanks (tpy) + Potential VOC Emissions from All Group 5 Engine Tanks (tpy) + Potential VOC Emissions from All Group 5 Engine Tanks (tpy) + Potential VOC Emissions from All Group 5 Engine Tanks (tpy) + Potential VOC Emissions from All Group 5 Engine Tanks (tpy) + Potential VOC Emissions from All Group 5 Engine Tanks (tpy) + Potential VOC Emissions from All Group 5 Engine Tanks (tpy) + Potential VOC Emissions from All Group 5 Engine Tanks (tpy) + Potential VOC Emissions from All Group 5 Engine Tanks (tpy) + Potential VOC Emissions from All Group 5 Engine Tanks (tpy) + Potential VOC Emissions from All Group 6 Engine Tanks (tpy)



Appendix 4 Redline of Requested Revisions to NSR Permit No. 7026-M5

## Greater Kudu LLC - proposed permit updates (in red text) NSR Permit No. 7026-M5

U	Source	Make	Serial	Permitted	Manufacture
Unit No.	Description	Model	No.	Capacity	Date
$eq:spectral_system_setup_se$	Backup Emergency Generators	Varies	Varies	Varies	Varies

## Requested update #1: Table 104.A: Regulated Sources List (Page A5 of A16)

		[			1
VLL5EG-5, VLL5EG-6					
VLL5EG-7, VLL5EG-8,					
VLL5EG-9, VLL5EG-10,					
VLL5EG-11,VLL5EG-12,					
VLL5EG-1R, VLL5EG-2R,					
VLL5EG-N1, VLL5EG-N2,					
VLL5EG-N3, VLL5EG-N4,					
VLL6EG-1, VLL6EG-2,					
VLL6EG-3, VLL6EG-4,					
VLL6EG-5, VLL6EG-6,					
VLL6EG-7, VLL6EG-8,					
VLL6EG-9, VLL6EG-10,					
VLL6EG-11, VLL6EG-12,					
VLL6EG-1R, VLL6EG-2R,					
VLL6EG-N1, VLL6EG-N2,					
VLL6EG-N3, VLL6EG-N4,					
VCN1EG-N1, VCN1EG-N2,					
VCN1EG-N3, VCN1EG-N4,					
VCN2EG-N1, VCN2EG-N2,					
VCN2EG-N3, VCN2EG-N4,					
VCN3EG-N1, VCN3EG-N2,					
VCN3EG-N3, VCN3EG-N4,					
VCN4EG-1,					
VCN5EG-N1, VCN5EG-N2,					
VCN5EG-N3, VCN5EG-N4,					
VCN6EG-N1, VCN6EG-N2,					
VCN6EG-N3, VCN6EG-N4					
<u>Group 6</u>					
VCNEG-DCBX, VCNEG-DCBY					
(32 Engines from Group 1,					
2 4 Engines from Group 2,					
2 Engines from Group 3,					
23 Engines from Group 4, and 57					
Engines from Group 5, and 2					
Engines from Group 6 per the					
application)					
TMP-1 and TMP-2					
(Up to 2 temporary, portable	Temporary				
engines used to support facility	Generators	TBD	TBD	TBD	TBD
operations, per the	Ceneratoris				
application)					

\*Diesel-fired fire water pumps are permit exempt pursuant to 20.2.72.202.A(4) NMAC.

Requested update #2: Table 105: Control Equipment List: (Page A7 of A16)

Control Equipment Unit No.	Control Description	Pollutant being controlled	Control for Unit Number(s) <sup>1</sup>
VLL5EG-1 through VLL5EG-12			VLL5EG-1 through VLL5EG-12
VLL5EG-N1 through VLL5EG-N4			VLL5EG-N1 through VLL5EG-N4
VLL5EG-1R, VLL5EG-2R	Selective		VLL5EG-1R, VLL5EG-2R
VLL6EG-1 through VLL6EG-12	Catalytic		VLL6EG-1 through VLL6EG-12
VLL6EG-N1 through VLL6EG-N4	Reduction		VLL6EG-N1 through VLL6EG-N4
VLL6EG-1R, VLL6EG-2R	(all 57 of the		VLL6EG-1R, VLL6EG-2R
VCN1EG-N1 through VCN1EG-N4	Group 5	NOx	VCN1EG-N1 through VCN1EG-N4
VCN2EG-N1 through VCN2EG-N4	engines and		VCN2EG-N1 through VCN2EG-N4
VCN3EG-N1 through VCN3EG-N4	all 2 of the		VCN3EG-N1 through VCN3EG-N4
VCN4EG-1	Group 6		VCN4EG-1
VCN5EG-N1 through VCN5EG-N4	engines)		VCN5EG-N1 through VCN5EG-N4
VCN6EG-N1 through VCN6EG-N4			VCN6EG-N1 through VCN6EG-N4
VCNEG-DCBX, VCNEG-DCBY			VCNEG-DCBX, VCNEG-DCBY

Requested update #3: Condition A110A (Page A8/A9 of A16)

A. Fuel and Fuel Sulfur Requirements

**Requirement:** All generators shall combust only Diesel Fuel, including Renewable Diesel Fuel. The sulfur content of the fuel shall not exceed 0.0015% sulfur by weight.

Monitoring: No monitoring is required. Compliance is demonstrated through records.

**Recordkeeping:** The permittee shall demonstrate compliance with the limit on total sulfur content by maintaining records of a current, valid purchase contract, tariff sheet or transportation contract for the liquid fuel, specifying the allowable limit or less. Alternatively, compliance may be demonstrated by keeping a receipt or invoice from a commercial fuel supplier, with each fuel delivery, which shall include the delivery date, the fuel type delivered, the amount of fuel delivered, and the maximum sulfur content of the fuel.

**Reporting:** The permittee shall report in accordance with Section B110.

Requested update #4: Condition A601 (Page A10 of A16)

A601 <u>Stationary Engines (Engines Group 1 through 56)</u>

## Requested update #5: Condition A601D (Page A12 of A16)

D. SCR Operation (Group 5 and 6 Emergency Generators)

**Requirement:** The Group 5 and Group 6 units shall be equipped and shall normally be operated with selective catalytic reduction (SCR) to control NOx emissions. These units shall also be equipped with alarms to indicate potential malfunctions of the SCR units. For unloaded maintenance or if a runtime event occurs while an SCR is malfunctioning, the associated Group 5 and Group 6 Emergency Generator may be operated as long as the permittee demonstrates compliance with the total pollutant emission rates (Tables 102.A & 102.B), allowable emission limits (Table 106.A), limits on engine hours of operation (Condition A108 A), and operation and emission calculations (Condition A601 H).

The permittee shall maintain the SCR units according to manufacturer's recommended maintenance.

**Monitoring:** The units shall normally be operated with the SCR, which includes catalyst maintenance periods. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine(s); or (2) replace the catalyst with a functionally equivalent spare to allow the engine to remain in operation. During periods of operation of a Group 5 and Group 6 unit with nonoperational SCR, the permittee shall additionally include this monitoring:

1) Monitor the alarms associated with the SCR units and record the description of alarms.

2) If any of the Group 5 or Group 6 units operate without the SCR functioning, the total hours of operation of each event shall be monitored.

**Recordkeeping:** The permittee shall maintain records in accordance with applicable Sections in B109, B110, and B111.

**Reporting:** The permittee shall report in accordance with applicable Sections in B109, B110, and B111.

Requested update #6: Condition A601E (Page A12 of A16)

**Requirement:** The units are subject to 40 CFR 60, Subparts A and IIII and shall comply with the requirements in Subpart A and the specific requirements of Subpart IIII.

This permit condition prohibits non-emergency use of these units and supersedes certain provisions of 40 CFR Subpart IIII in order for these units to qualify as exempt units under 20.2.72.202(B)(3) NMAC. The units are not authorized to operate in any non-emergency mode. Any operation of these units as defined in 60.4211(f)(3) voids the applicability of the exemption of these units under 20.2.72.202(B)(3) NMAC and the permittee must submit a significant permit revision to the Department to permit the generators as regulated equipment under Part 72.

The regulated equipment will continue to be exempt under 20.2.72.202(B)(3) NMAC as these are standby generators operated as emergency generators as defined by 40 CFR 60, Subpart IIII. Each standby generator will be operated less than 500 hours per year.

**Monitoring:** The permittee shall comply with all applicable monitoring requirements in 40 CFR 60, Subpart A and Subpart IIII, including but not limited to §60.4211.

**Recordkeeping:** The permittee shall comply with all applicable recordkeeping requirements in 40 CFR 60, Subpart A and Subpart IIII, including but not limited to §60.4214.

**Reporting:** The permittee shall comply with all applicable reporting requirements in 40 CFR 60, Subpart A and Subpart IIII, including but not limited to §60.4214.

Requested update #7: Condition A601H (Page A14 of A16)

**Recordkeeping:** The Permittee shall record the following:

1) the hours of operation of each emergency generator from the hours recorded using the nonresettable hour meter;

2) the type of generator operating (Group 1, 2, 3, 4, <del>or</del> 5, or 6) and the reason the generator was in operation during that time. The record shall provide a detailed description of the cause of operation for each generator and shall also include whether the operation was due to routine maintenance, preventative maintenance, or operation due to unavoidable loss of commercial utility power;

3) the maximum engine load per run during any operation of each emergency generator.

The Permittee shall use the records of the maximum load per run and hours of operation of each engine as required above and the emission rates shown in Table 1 or alternate emission rates (e.g., rates determined from stack testing) upon approval from the Department to calculate the monthly total and the monthly rolling 12-month total NO<sub>x</sub> and CO emissions from the entire facility. The Permittee must retain records of the monthly calculations. Monthly NO<sub>x</sub> and CO emissions shall be determined by the following equation:

NSR Permit No. 7026-M5	NO <sub>x</sub> Emission Factor – Group 6	NO <sub>v</sub> Emission Factor – Group 6
Page A15 of A16	Engines when SCR non-operational	Engines when SCR operational
Engine Load	(CO Emission Factor)	(CO Emission Factor)
	All factors in lb/hr	All factors in lb/hr
100% Load	63.65 (12.04)	6.37 (12.04)
75% Load	35.23 (7.59)	6.37 (7.59)
50% Load	20.37 (4.26)	6.37 (4.26)
25% Load	9.92 (3.25)	6.37 (3.25)
10% Load	3.97 (1.30)	6.37 (1.30)

Appendix 5 Renewable Diesel Fuel Specifications

# FREQUENTLY ASKED QUESTIONS ON HVO FUEL

## WHAT IS HVO?

- **1.** What is HVO fuel? What is it made of? HVO is a hydrotreated vegetable oil, which is made of paraffinic hydrocarbon. The fuel is derived from the same feedstocks used to produce biodiesel. However, instead of using transesterification process, HVO is produced via hydrotreated process.
- 2. What is the difference between HVO and biodiesel/FAME (Fatty Acid Methyl Ester)? Both HVO and biodiesel can be derived from the same feedstocks but through different processes. The major difference between biodiesel and HVO is biodiesel contains oxygenated groups which potentially impacts the fuel stability. However, HVO is produced via a hydrotreatment process, so there is no oxygenated group, which helps improve fuel oxidation stability.
- **3.** What is the difference between HVO and GTL fuels? Physically and chemically, both fuels are the same fuel and meet the EN 15940 fuel specification. There are two major differences between HVO and GTL fuels. HVO is produced from renewable feedstocks. GTL is produced from a fossil fuel, natural gas. Moreover, HVO is produced via a Hydrotreated process, and GTL is produced via the Fischer Tropsch process.
- 4. What is the reason for HVO fuel getting promoted more when compared with other renewable fuels? HVO is being promoted due to its very low carbon content which helps operators meet their carbon reduction goals. Unlike biodiesel, HVO has good oxidation stability and is not prone to bacterial growth making HVO suitable for standby applications.
- 5. What are the differences between HVO Fuel and Diesel Fuel? HVO chemically and physically is very similar to diesel fuel. There are couple differences, HVO has (1) ~ 7% less fuel density, (2) limited aromatic content, (3) limited sulfur content, (4) higher cetane value, (5) a bit higher H/C (Hydrogen/Carbon) ratio.



### **CUMMINS APPROVAL AND WARRANTY**

- 6. Does Cummins approve the use of HVO fuel on Cummins generator sets? Cummins approves use of HVO fuel in all\* EPA Tier 2, TA Luft 2g and emissions unregulated standby generator sets.
- **7.** Does Cummins approval cover engines used in G-Drive application? Engines used in G-Drive applications are approved provided the application is standby.
- **8.** Is there a Cummins recommendation for HVO fuel specification? *Cummins requires that HVO fuel comply with the requirements of EN15940.*
- **9. Can we purchase HVO fuel from any manufacturer?** HVO may be sourced from any supplier provided that the fuel complies with EN15940.
- **10. Are Cummins products covered under warranty using HVO fuel?** Warranty is covered for all products listed for use with HVO fuel on the Cummins fuels bulletin. This includes all standby generator sets typically used in data center applications.
- 11. What is the procedure that we should be following to use HVO fuel on a product that is not approved by Cummins? Contact your Cummins distributor or account manager.
- 12. Our local regulation has a higher min. flash point requirement than what is stated in EN15940 (e.g. Local Regulation Min flash Point is 65 deg C vs EN15940 Min flash point is 55 deg C). Can this fuel be used? Yes, fuel with higher flash point then the min requirement by EN15940 can be used. Confirm with supplier that it meets the local regulations.

### PERFORMANCE

- **13. What is the performance difference using HVO fuel compared to standard Diesel Fuel?** With the exception of fuel consumption there are no inherent differences in generator set performance between diesel and HVO beyond normal site and unit to unit variation. There is a potential mechanical power loss of 1 2% due to the lower energy density of HVO fuel. At most generator set power nodes there is sufficient margin between engine power rating (after auxiliary losses and derates) and the generator set rating so that no generator set derate will be required.
- **14. What is the difference between standard fuel and HVO fuel in fuel consumption?** HVO fuel will have up to 5% higher fuel consumption than what is documented on the data sheet. Add 5% to data sheet values for application needs.
- **15. What are the typical failures for Cummins Engines running with HVO fuel?** There are no anticipated failures attributed to running the generator sets with HVO fuel.
- **16. Can we mix HVO fuel with Diesel Fuel in the fuel tank?** Any blend of diesel and HVO is acceptable with no anticipated difference in engine behavior except for slightly greater fuel consumption.

## **EMISSIONS COMPLIANCE**

- **17.** Is there any impact to emissions performance when using HVO? NOx emissions are comparable and PM emissions are lower when using HVO fuel compared to diesel.
- **18. Is there any impact to Emissions Certifications?** EPA Tier 2 certification and TA Luft 2g compliance are not impacted by using HVO fuel. (EPA certification requires a specific blend for certification and publishes requirements for fuels to be used in the field. HVO meets those requirements.)
- **19.** Are there separate emissions data sheets for HVO? No, standard emissions data sheets are to be used for submittals and permitting.

**20.** Is there any impact to site permitting? There are no expected differences in emissions performance between diesel and HVO. HVO may result in slightly higher fuel consumption than diesel, so that will have to be accounted for in permits that call for measuring fuel consumption. Site permits are issued at the discretion of local authorities. Cummins will support our data center customers in working with authorities on defining and complying with permit requirements.

## **OPERATION AND MAINTENANCE**

- **21. What are the recommendations for maintenance, storage and fuel polishing of HVO?** *Maintenance, fuel polishing and storage recommendations are the same for diesel and HVO\*. Most fuel polishing systems will work with either diesel or HVO without modification.*
- **22.** Is bacterial growth a concern with HVO as it is with biodiesel? *No, HVO is a more stable fuel than biodiesel and is not susceptible to bacterial growth and oxidation stability concerns.*
- **23. What are the considerations regarding cold weather operability with HVO?** Confirm with the fuel supplier that the HVO purchased will work at all site ambient conditions. Note that traditional methods of fuel blending or anti-gelling agents may not be effective.
- 24. Are there any differences between HVO and diesel in terms of what additives can be used? In general Cummins neither approves nor disapproves of additives, however many diesel additives can be used with HVO. There are only two additives endorsed by Cummins for use with either diesel or HVO: PowerService Diesel Kleen +Cetane Boost and PowerService Diesel Fuel Supplement +Cetane Boost. Check with your fuel supplier to confirm the effectiveness of other additives.

25. Can fuel heaters be used with HVO? Yes

\*With the exception of some configuration of QSX15 powered generator sets. Consult the Cummins fuels bulletin for details.



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# **GENERATOR SET PERFORMANCE ON HVO FUEL: QSK95 TEST REPORT SUMMARY**

White paper by Nicholas Hawes

## **EXECUTIVE SUMMARY**

This paper provides results of separate back-to-back tests on QSK95 diesel engines with Ultra Low Sulfur Diesel #2 (ULSD #2) fuel and Hydrotreated Vegetable Oil (HVO) fuel. Testing was performed with a production-built development engine in an engineering test cell (mechanical power for a 60Hz 3500 kWe Standby genset) and in the field with a QSK95 60Hz production genset (3000 kWe Standby genset). No changes or conversions were made to the engines (including ECM calibrations) between testing on the different fuels; the only difference between the two tests is the fuel used to conduct the testing.

The results of this testing can be summarized as follows:

- Exhaust Emissions:
  - Lower smoke and particulate matter emissions with HVO fuel
  - Comparable NOx emissions
- Power and Fuel Consumption:
  - Potential for 1-2% lower power with HVO fuel at the engine dataplate Standby mechanical power
  - 3-5% higher fuel consumption by volume with HVO fuel
- Transients and Emergency Start Times:
  - Comparable transient and emergency start time performance

Cummins has conducted similar testing on other High Horsepower generators and similar performance offsets are expected.



## INTRODUCTION

Hydrotreated Vegetable Oil (HVO) is a bio-based paraffinic diesel fuel. It is one form of renewable fuel that is produced from vegetable oil and animal fats. The main difference between biodiesel and HVO fuel is the production process for each fuel. Biodiesel is produced through an esterification process and HVO fuel is produced through a hydrotreatment process. Cummins requires paraffinic fuels to meet EN15940 per Fluids for Cummins Products Service Manual (5411406), section 1.

To support customer adoption of HVO fuel, Cummins performed back-to-back testing on Ultra Low Sulfur Diesel #2 (ULSD #2) fuel and HVO fuel in a QSK95 generator set and a QSK95 engineering test cell. This testing aimed to evaluate engine performance and emissions when operating on these fuels.

Cummins has previously tested paraffinic fuels on multiple engines and configurations to support the use of renewable fuels in the field. Examples can be found in the following SAE documents:

- Calibration Optimization of a Heavy-Duty Diesel Engine with GTL Diesel Fuel
- Emissions and Fuel Economy Evaluation from Two Current Technology Heavy-Duty Trucks Operated on HVO and FAME Blends

## FUELS TESTED

An evaluation of engine performance and emissions was conducted using ULSD #2 fuel and HVO fuel. Engineering tests were performed with R100 HVO fuel. Field tests were performed with R99 HVO fuel. Details on fuel analysis results can be found below:

	ENGINEE	RING TEST	FIELD TEST		
FUEL TYPE	ULSD #2	R100 HVO fuel	ULSD #2	R99 HVO fuel	
Sulfur (ppm)	12.6	3.5	9.0	0.7	
Viscosity (cst)	2.11	3.57	2.24	3.14	
API Gravity	38.0	50.6	38.7	48.9	

## TEST PLAN

Steady state:

1. D2 5 mode test cycle (100%, 75%, 50%, 25%, and 10% load points)

Transient:

- 1. NFPA110 emergency starts
- 2. ISO 8528-5 load steps
- 3. Custom transient load steps (0%-50%, 50%-100%, 100%-50%, 50%-75%, 75%-100%, 100%-75%, 75%-50%, 50%-0%, 0%-100%, 100%-0%)

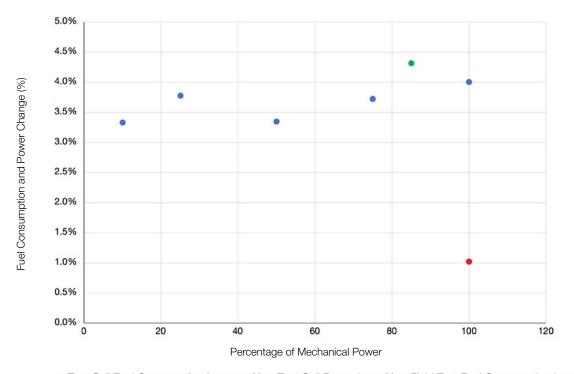
## TEST RESULTS

The same mechanical powers (engineering test cell) and electrical powers (field test) were targeted for each of the back-to-back tests.

A 3-5% increase in fuel consumption with HVO fuel, as compared to ULSD #2 fuel, was observed during engineering (lab grade equipment fuel meter) and field (fuel tank measurements) tests (see Figure 1). Due to the lower energy by volume with HVO fuel, a mechanical power loss of 1-2% was observed during engineering testing (see Figure 1). Depending upon the performance variation of the production engine installed in the generator set, this loss might be observed when running at the engine dataplate Standby mechanical power.

- In the generator set application, engine speed/frequency will start to drop before the generator set is no longer able to produce the requested power.
- At power nodes where the available mechanical power (after auxiliary losses and derates) exceeds the generator set electrical power rating, the power loss with HVO fuel may be fully absorbed or reduced.

Figure 1: Fuel Consumption and Power Change with HVO Fuel. Observed fuel consumption and power change when operating with HVO fuel compared to ULSD #2 fuel



The engineering and field test data show comparable NOx emissions at the D2 5 mode points (see Figure 2). 5% error bars were added to the NOx measurements to account for measurement variation. The following methods were followed for the NOx measurements:

- Engineering test: ISO 8178-1:2006
- Field test: EPA method 7E

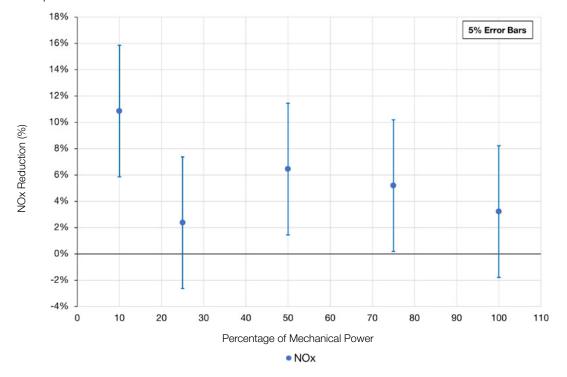


Figure 2: NOx Reduction with HVO Fuel (Engineering Test). Observed NOx when operating with HVO fuel compared to ULSD #2 fuel

Particulate matter emissions were reduced 30-60% with HVO fuel as compared to ULSD #2 at the D2 5 mode points during engineering tests (see Figure 3). 10% error bars were added to the PM measurements to account for measurement variation. A 20-30% reduction in PM using HVO fuel as compared to ULSD #2 was observed in the field at modes 1 and 2 (100% and 75% load). A reduction in PM aligns with the minimal aromatic content of HVO fuel. The sensitivity of particulate matter measurements along with differences in performance parts may result in field measurements outside of this range. The following methods were followed for the particulate matter measurements:

- Engineering testing: ISO 8178-1:2006
- Field test: EPA methods 5 and 202

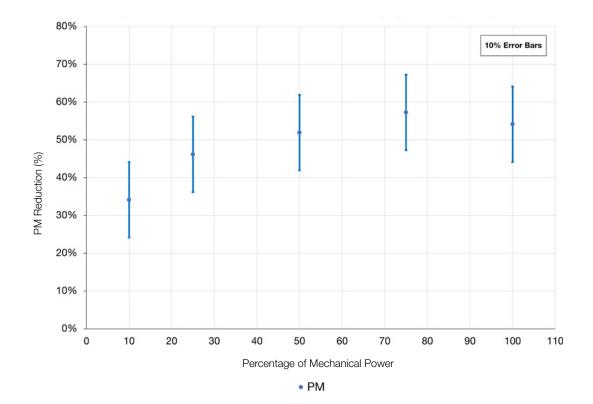


Figure 3: PM Reduction with HVO Fuel (Engineering Test). Observed PM when operating with HVO fuel compared to ULSD #2 fuel

Smoke emissions were measured during engineering testing with an AVL 415 smoke meter. The reduction in smoke emissions with HVO fuel as compared to ULSD #2 followed the same trend as particulate matter emissions.

Transient and emergency testing was performed at 1.0 Power Factor and 480 Volts. Comparable transient performance between HVO and ULSD #2 fuel were observed when running the ISO 8528-5 and part load steps (see Figures 4 and 5). Emergency start time performance also showed comparable performance between the 2 fuels.

#### Notes for the test results above:

Test results are based on the use of R100 HVO fuel during the engineering test and R99 HVO fuel during the genset field test. Sensitivity to all HVO fuel blends is not known at this time on the QSK95. Steady state emissions were recorded per ISO8178-1 during operation at rated engine speed (+/-2%) and stated constant load (+/-2%) with engine temperatures, pressures and emission rates stabilized. This data is subject to instrumentation and engine-to-engine variability. Field emissions test data is not guaranteed to these levels. Actual field test results may vary due to several factors, including test ambient temperature, site conditions, installation, fuel specification, test procedures, instrumentation, and ambient correction factors. Engine operation with excessive air intake or exhaust restriction beyond published maximum limits, or with improper maintenance, may result in elevated emission levels.

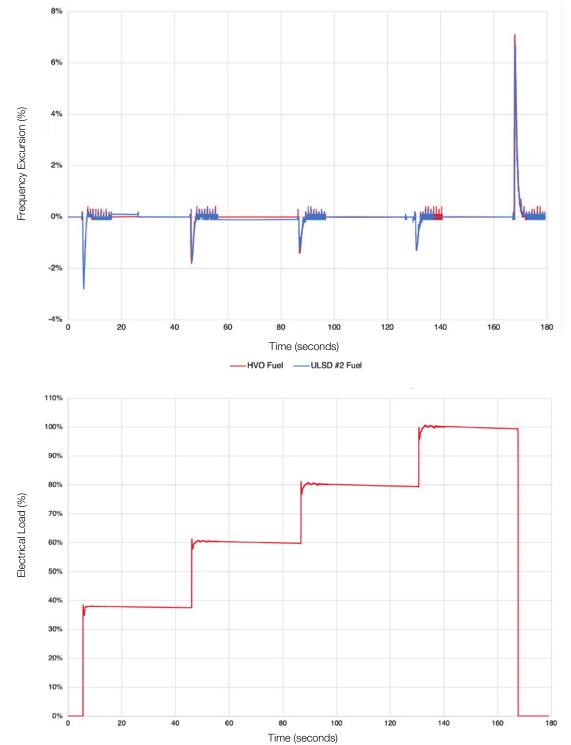


Figure 4: QSK95 60Hz 3000 kWe Field Test ISO Load Steps. Observed genset frequency under ISO load steps when operating with HVO fuel compared to ULSD #2 fuel

Electrical Load

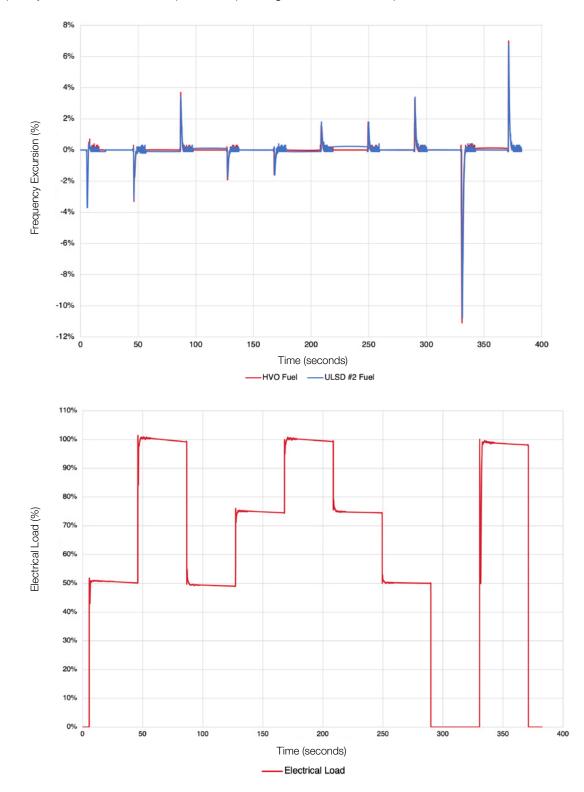


Figure 5: QSK95 60 Hz 3000 kW Frequency Excursion with Custom Load Steps. Observed genset frequency under custom load steps when operating with HVO fuel compared to ULSD #2 fuel

## SUMMARY

Testing on the QSK95 demonstrates the capability of this product to run on HVO fuel. Cummins requires paraffinic fuels to meet EN15940 per Fluids for Cummins Products Service Manual (5411406), section 1. The differences in emissions and performance should be noted before applying this alternate to diesel fuel in the field:

- Potential for 1-2% lower power with HVO fuel when running at the engine dataplate Standby mechanical power
   Derated Standby power nodes should not see 1-2% electrical power loss with HVO fuel
  - (ex. 3000 kWe 60 Hz QSK95 genset products with the base engine rating).
- Potential for 3-5% higher fuel consumption by volume with HVO fuel
- Expected comparable NOx emissions with HVO fuel
- Expected lower particulate matter and smoke emissions with HVO fuel
- Expected comparable transient and emergency start time performance with HVO fuel

Cummins has conducted similar testing on other High Horsepower generators and similar performance offsets are expected.

This paper and the data described herein is for informational purposes only to evaluate the potential engine and emissions performance of the QSK95 operating on HVO fuel. Owners/operators may need to conduct testing and obtain approval from state, local, or federal permitting authorities prior to use of HVO fuel in the field. Accordingly, High Horsepower generator set owners/operators should consult with regulatory authorities as appropriate.

# ABOUT THE AUTHOR



Nicholas Hawes has been supporting the development of global High Horsepower generator set engine ratings since 2013 with a focus on performance and emissions optimization. He provides on-site and remote support for generator set performance and emissions throughout the product lifecycle. Nick has worked on several global projects to enable sitespecific performance capability and emissions compliance. Nick received a Bachelor of Science degree in Mechanical Engineering Technology from Indiana University-Purdue University Indianapolis.



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Nicholas Hawes CPE Technical Specialist



## **Power Generation**

# HVO FUEL PROVEN TO BE EFFECTIVE FOR DIESEL GENERATOR SETS

By **Brian Ponstein** Senior Product Manager

And Jens Engelhardt Senior Manager, Development Engineering The energy landscape is changing rapidly with a clear focus on cleaner solutions in the pursuit of net zero emissions. The goal is to achieve this reduced environmental impact without sacrificing the hallmark benefits of reliability, efficiency, and load acceptance of diesel gensets.

## Testing fuel performance

Rolls-Royce approves the use of synthetic paraffinic diesel fuel, also referred to as Hydrotreated Vegetable Oil (HVO), for its *mtu* Series 4000 and Series 1600 gensets in power generation applications. This paper provides a detailed review of the testing of an *mtu* Series 4000 diesel generator set operating on standard diesel fuel as well as on HVO fuel.



System tests were conducted in the field with mobile measurement technology. Engine-only tests were performed on a test bed, generating more accurate data results. The results of the testing confirm the effectiveness of HVO as a drop-in fuel for *mtu* diesel generator sets. In comparing the performance criteria between diesel and HVO fuel, no significant effects on general performance were observed. In fact, several positive factors were observed when using HVO.

#### HVO testing showed:

- A decrease in NOx, CO $_{\scriptscriptstyle 2}$ , and PM
- Improved response to load acceptance
- Full power performance
- Decreased fuel consumption

This test was conducted using both an *mtu* 20V 4000 G94S engine as well as a 20V 4000 DS3000 generator set.

The assessment of this test addressed the following areas:

- Load step behavior: Diesel & HVO
- Emissions testing: Diesel & HVO
- Fuel consumption comparison
- Endurance run on HVO

#### **Fuels tested**

The testing comparison of engine generator set performance was conducted using distillate diesel fuel and HVO. The diesel fuel used followed DIN 51603 (BO) and the HVO fuel followed EN15940 Class A. In the U.S., engine-only tests were performed using ULSD and HVO meeting ASTM 975. The chart below also shows ASTM D975 and EN 590 for reference.

Parameter	Unit	ASTM D 975 ULSD	EN 590	DIN 51603 Heating Oil EL low sulfur	EN 15940 Class A	Shell HVO (Batch DK6272)
Cetane number	-	min 40	min 51	na	min 70	75,5
Cetane index	-	min 40	min 46	na	na	na
Density at 15°C	kg/m³	na	820-845	max 860	765-800	779,6
Sulfur content	ppm	max 15	max 10	max 50	max 5	< 5
Total aromatics	% (m/m)	max 35	na	na	max 1,1	na
Flashpoint	°C	min 52	min 55	min 55	min 55	76
Viscosity at 40 °C	mm²/s	1,9-4,1	2,0-4,5	max 3,8	2-4,5	2,873
FAME content	Vol %	max 5	max 7	max 0,5	max 7	0,0
Oxidation stability	h	na	min 20	na	min 20	> 48
Oxidation stability	g/m³	na	max 25	na	max 25	< 2
Lubricity at 60 °C (HFRR value)	μm	max 520	max 460	max 460	max 400	339
Total contamination	mg/kg	na	max 24	max 24	max 24	< 12
Water content	mg/kg	na	max 200	max 200	max 200	36
Water + sediment	Vol %	max 0,05	na	na	na	na

For reference, Shell HVO is the fuel sample from the testing as a comparison to the standards. Note: Fuel

specifications state ranges, maximums, or minimums for various fuel characteristics.

## Test results

The test was completed using a complete generator set. On both fuels, the full nameplate rating of the genset was achieved. The emission test equipment was installed after the engine in the exhaust system.

#### **Fuel consumption**

Figure 1 shows data from the engine via ECM recording, comparing engine power and fuel consumed at each load point. The unit was loaded to the same electrical load for each load step on the two different fuels.

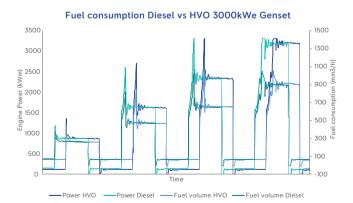
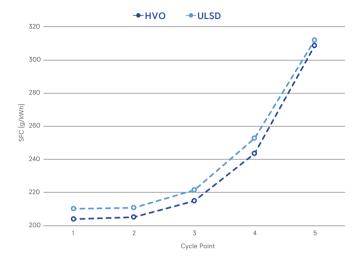
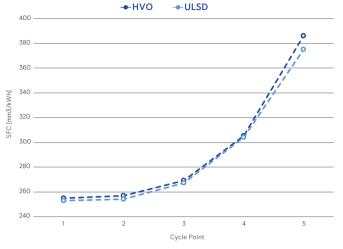


Figure 1

Below, Figure 2 shows the fuel consumption for the EPA D2 cycle load points based on an engine brake dynamometer. The results show HVO has a higher energy per mass, but a lower energy per volume. Therefore, fuel consumption values for HVO could differ slightly from published values for distillate diesel fuel and this should be taken into consideration if permitting is based on fuel consumption. The chart on the left shows the specific fuel consumption improves using HVO, which can be explained by higher combustion efficiency due to HVO's higher Cetane number. However, the chart on the right shows a slightly higher volumetric fuel consumption, which can be attributed to the HVO's lower density.





## SFC (g/kWh)

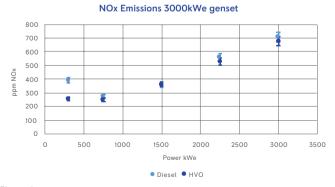
Cycle Point	HVO	ULSD	% Diff
1	203.8	210.2	-3%
2	205.1	210.9	-3%
3	215	221.5	-3%
4	243.6	252.7	-4%
5	308.5	311.8	-1%

#### SFC (cm3/kWh) Cycle Point HVO ULSD % Diff 0.255 1 0.253 1% 2 0.257 0.254 1% 3 0.269 0.267 1% 0.305 0.304 4 0% 0.386 0.375 5 3%

Figure 2: Fuel consumption from dynamometer testing

#### NOx comparison

For the NOx values, a 5% error bar is added to the charts to show potential sensor error (Figure 3). The data shows a NOx reduction of approximately 8% when operating with HVO, with a higher reduction at lower loads. When looking at the EPA weighted average (D2 cycle), the delta becomes more evident on the potential reduction (Figure 4).



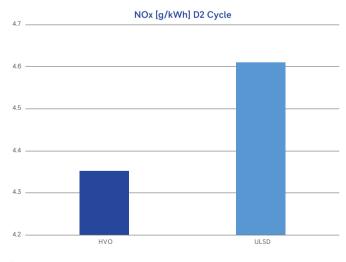


Figure 4

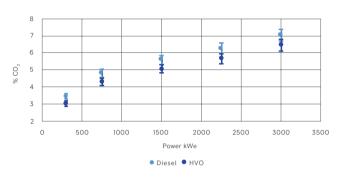
#### Figure 3

#### CO<sub>2</sub> comparison

The test analyzed tail pipe emissions, and  $CO_2$  footprint reduction well-to-wheel depending on fuel feedstock. For the  $CO_2$  values, a reduction is consistent. A reduction of 3% was seen in the D2 Cycle emissions testing.

The real CO<sub>2</sub> advantage of HVO, and why it is considered a renewable fuel, is not reflected in the data but can be found in the feedstock. Whereas coal does not absorb CO<sub>2</sub> before it is converted into diesel fuel, the feedstocks used for HVO (such as sunflower) absorb CO<sub>2</sub>. This results in a very minimal increase of total CO<sub>2</sub> emissions if using HVO. CO<sub>2</sub> neutrality differs by feedstock and production process.

CO<sub>2</sub> Emissions 3000kWe genset



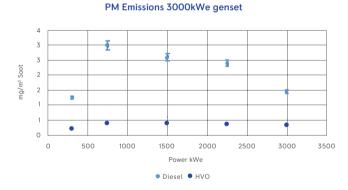
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Figure 5

720 -

#### Particulate Matter (PM) comparison

Significant reduction in PM emissions was observed when operating on HVO fuel. The reduction of PM emissions ranges from 50-80% depending on load point, with a 42% reduction in D2 cycle emissions.



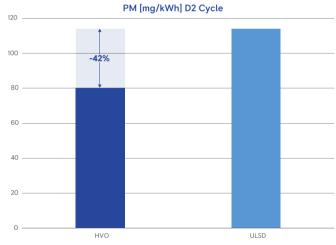


Figure 6

#### CO<sub>2</sub> [g/kWh] D2 Cycle

#### Transient response

The transient behavior when operating on HVO fuel is comparable to the performance of operation with distillate diesel fuel. Figure 7 provides a summary of the load steps with the corresponding frequency dip and recovery time.

Figures 8 and 9 show the behavior of each fuel as well as the acceptance tolerance according to ISO 8528 for voltage and frequency.

The end of line (EOL) parameters for this engine were adjusted using diesel fuel. Figure 9 shows the same maximum power was achieved using HVO even if the end-of-line-testing is done with diesel fuel.

#### Transient response 3000kWe Genset

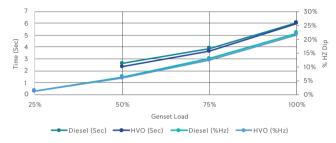
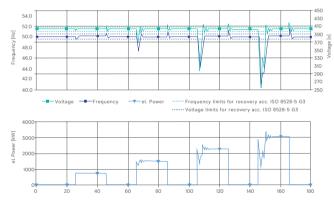


Figure 7





## Conclusion

The use of HVO as a drop-in fuel has shown acceptable performance in controlled applications. Therefore, HVO fuel is approved for use in *mtu* Series 4000 and Series 1600 generator sets.

The testing showed full nameplate power could be achieved equally using both fuels. In addition, the test shows the following benefits when operating on HVO fuel as an alternative to distillate diesel: - Lower NOx, PM and CO<sub>2</sub> emissions at nearly all load points - Marginal transient performance improvement

As with all fuels, the end user must work closely with its fuel supplier to ensure it is getting the optimal fuel for its application and installation. In addition, proper fuel storage must also be assessed, as it is important for the fuel to be of acceptable quality to ensure reliability and sustainability of the product. Lastly, the feedstock for the HVO fuel should be considered to truly assess the well-to-wheel  $CO_2$  reduction and environmental impact.

Please consult with your local mtu representative when using HVO fuel.

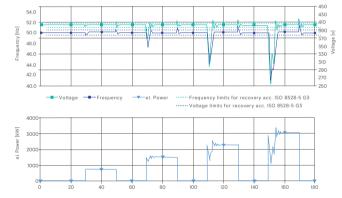


Figure 9: Transient behavior with HVO fuel

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