

Application Review Summary - Title V Operating Permit

COMPANY: Public Service Company of New Mexico
FACILITY: Reeves Generating Station
PERMIT NO.: 0499-M2-RN2
AIRS No.: 35/001/00011
LOCATION: 4400 Paseo del Norte, NE
 Albuquerque, NM 87109
 Lat.: 35°10'17" ; Long.: 106°36'04"
PERMIT WRITER: Barbara Georgitsis
DATE APPLICATION RULED COMPLETE: April 8, 2021

Permit Review	
Permitting (initial & date): AL,	Compliance/Enforcement (initial & date): DR-no review, refer to email
	Legal Review (if applicable - initial & date): N/A
Date to Permittee/Facility for review: 6/13/23	Date of Permittee/Facility response: 6/20/23
Public Notice (30-day comment):	Any Comments from Public Notice:
Date Proposed Permit to EPA:	Any Comments from EPA:
Date Final permit to Permit Manager or Asst Director for signature:	

1.0 Legal:

The draft permit conditions in the Public Service Company of New Mexico Reeves Generating Station (Facility) air operating permit to be issued under the authority of the Albuquerque Environmental Health Department (Department) and the Albuquerque/Bernalillo County Air Quality Control Board (A/BCAQCB); pursuant to the Federal Clean Air Act (CAA, also known herein as the Federal Act); the New Mexico Air Quality Control Act, NMSA 1978, as amended 74-2-4, 74-2-5.C; the Joint Air Quality control Board Ordinance, Revised Ordinances of Albuquerque 1994, 9-5-1-4; the Joint air quality Control Board Ordinance, Bernalillo County Ordinance 94-5; A/BCAQCB Regulation Title 20, New Mexico Administrative Code (NMAC), Chapter 11 (20.11 NMAC), Chapter 11, Part 41 (20.11.41 NMAC), Construction Permits; Part 42 (20.11.42 NMAC), Operating Permits. Unlike the permit, this document is not legally enforceable. This document includes references to the applicable statutory or regulatory provisions that relate to PNM Reeves emissions to the atmosphere. This permit #0499-RN2 supersedes permit #0499-M2-AR1-RN1 and adopts all permit conditions as written.

2.0 Plant Process Description:

This Facility is a natural gas-fired electric generating plant comprised of three natural gas-fired steam boilers and their associated equipment which generates steam to drive steam turbines coupled to generators that produce electricity.

Units 1 & 2 are each rated at 44 MW and Unit 3 is rated at 66 MW. Unit #1 was constructed in 1960 and can generate 467,500 lbs of steam per hour at a temperature of 950 F and a pressure of 1380 psia. Unit #2 was constructed in 1958 and can generate 467,500 lbs of steam per hour at a temperature of 950 F and a pressure of 1380 psia. Unit #3 was constructed in 1962 and can generate 700,000 lbs of steam per hour at a temperature of 950 F and a pressure of 1380 psia. All three units are sources of criteria pollutant emissions due to fossil fuel combustion. All three units are subject to the provisions of the Acid Rain program since each unit has a nameplate rating over 25 MW of electrical generating capacity and burn natural gas as a fuel.

The associated equipment supporting plant operations consists of three (3) cooling towers and fuel pipeline fugitive emissions. The cooling towers discharge latent heat to the atmosphere transferred from each steam condenser and is a source of particulate emissions by emitting dissolved solids from the circulating water. A diesel fired backup generator that was installed in 2009. Following is a table of Significant emission units:

Emission Unit	Unit Description	Manufacturer	Model Number	Serial Number	Date of Mfg.	Installation Date	Rated Process Rate
S101	Unit 1 Steam Boiler (Natural Gas Fired)	Babcock & Wilcox	Unknown	21032	Unknown	1960	44 MW (nameplate) 51 MW (maximum)
S102	Unit 2 Steam Boiler (Natural Gas Fired)	Babcock & Wilcox	Unknown	NSB19922	Unknown	1958	44 MW (nameplate) 51 MW (maximum)
S103	Unit 3 Steam Boiler (Natural Gas Fired)	Babcock & Wilcox	Unknown	20666	Unknown	1963	66 MW (nameplate) 78 MW (maximum)
S109	Emergency Generator (Diesel Fired)	Cummins	QSX15-G9	32065523	2009	2009	755 hp
S305	Unit 1 Cooling Tower	N/A	N/A	N/A	N/A	N/A	36,000 gal/min
S306	Unit 2 Cooling Tower	N/A	N/A	N/A	N/A	N/A	36,000 gal/min
S307	Unit 3 Cooling Tower	N/A	N/A	N/A	N/A	N/A	55,000 gal/min

3.0 Description of this Permit Action: This is a Title V Permit Renewal. Authority-to-Construct (ATC) Permit #2025 was revised and Source Registration #2148 was closed, and the renewed permit reflects those changes. Also addressed in this renewal are some typos in the Criteria Pollutant Emissions Limit Table and a request to remove quarterly visual opacity testing requirements for the three main boilers.

4.0 Prevention of Significant Deterioration:

This facility is a listed source under the Prevention of Significant Deterioration (PSD) regulations. It is a grandfathered source since it has not undergone a major modification as defined by the PSD rules and therefore has not triggered these requirements.

5.0 History:

Permit Number	Issue Date	Action Type	Description of Action (Changes)
0499-RN2	Pending	Title V Permit Renewal	Title V permit 2 nd Renewal
Acid Rain AR0499-RN2	Pending	Renewal	2 nd Renewal (see AR0499-RN2 DRAFT permit and AR0499-RN2 DRAFT review summary)
0499-M2-RN1	February 8, 2017	Title V Permit Modification /Renewal	First Renewal incorporating modification M2 which was to correct emission unit's S104 being incorrectly listed as an insignificant activity, update emission unit S109 in the Process Equipment table, and update the Applicable Requirements table
Acid Rain AR0499-RN1	February 8, 2017	Renewal	Renewal of Federal Acid Rain permit
0499-M1-RN1	December 4, 2003	Title V Permit Modification /Renewal	Increase requested permitted allowable emission rates and to incorporate 20.11.67 NMAC as an applicable requirement
2025-RV1	July 12, 2011	NSR Permit	This permit was issued to correct typos, update engine information labeled as "TBD", and edit/add/remove permit conditions
2025	August 21, 2009	NSR Permit	This permit was issued to replace emission unit S109 which is a diesel fired backup generator that was installed
0499	March 10, 1998	Title V Permit	Initial Title V permit issued

6.0 Updates from Previous Permit

Device, EU's	Description
S109	In Emissions Table 5, removed the combined NOx/NHMC emissions column and separated the combined emission to NOx and NMHC (VOC), according to reporting requirements in permit #2025-RV1.
S109	Facility recalculated SO ₂ using 0.0015% (15 ppm) sulfur content

	for No. 2 fuel oil which is the maximum allowable for No. 2 fuel oil; therefore, the SO ₂ , emission rates, lb/hr & tpy, were slightly reduced from previous permit.
S101, S102, S103	Table 7. Reporting Requirements, removed "Entire Facility" and added language to report GHG annually to the Administrator, EPA pursuant to 40 CFR 98.
Entire Facility	TSP is no longer regulated, only PM ₁₀ and PM _{2.5} ; therefore, TSP column from emission Table 5 was removed. The Facility reports PM ₁₀ which includes PM _{2.5} .
Entire Facility	Total HAP emissions were calculated in the application have been added to the annual Permit Fee table.

7.0 Public and EPA Response/Concerns:

The public comment period ran from ____ through ____ ?comments were received.
The EPA comment period ran from ____ through ____

8.0 Compliance Testing:

Date of Compliance Test	Regulatory Requirement	Description of Compliance Test	Units Tested
2022	40 CFR 75	Relative Accuracy Test Audit (RATA) to certify compliance with O ₂ and nitrogen oxides NO _x Continuous Emissions Monitor Systems (CEMS) and CO emission limits	1, 2, 3
2021	40 CFR 75	RATA to certify compliance with O ₂ and nitrogen oxides NO _x CEMS and CO emission limits	1, 2, 3
2020	40 CFR 75	RATA to certify compliance with O ₂ and nitrogen oxides NO _x CEMS and CO emission limits	1, 2, 3
2019	40 CFR 75	RATA to certify compliance with O ₂ and nitrogen oxides NO _x CEMS and CO emission limits	1, 2, 3
2018	40 CFR 75	RATA to certify compliance with O ₂ and nitrogen oxides NO _x CEMS and CO emission limits	1, 2, 3

*The Facility is compliant with the testing requirements.

9.0 Startup and Shutdown:

No plan was submitted since this is an application for renewal, however, PNM did submit a Startup/Shutdown plan as part of their application for a modification dated September 2001.

10.0 Compliance and Enforcement Status [Title V only]:

The Permittee has certified compliance with all applicable requirements. The Department's Compliance Section has certified that there are no outstanding notices of violation or settlement agreements as of issuance of this draft Permit, 2023.

11.0 Air Dispersion Modeling:

Dispersion modeling analysis was not required as part of the application submitted for this renewal on February 5, 2021.

12.0 State Regulatory Analysis – New Mexico Administrative Code (NMAC):

20 NMAC	Title	Applies (Y/N)	Comments
11.02	Permit Fees	Y	Applicable for all sources subject to 20.11.42 NMAC – Operating Permits.
11.05	Visible Air Contaminants	Y	This rule provides visible emission limitations on specific stationary sources and mobile sources such as incinerators, pathological waste destructors, crematoriums, stationary spark ignition engine, diesel-powered engine; railroad train or aircraft. PNM Reeves owns and operates a stationary (diesel-powered) engine that is subject to the requirements of this rule.
11.08	Ambient Air Quality Standards	Y	The objective of 20.11.8 NMAC is to adopt local ambient air quality standards that are identical to the federal NAAQS codified at 40 CFR Part 50, and to adopt applicable state Ambient Air Quality Standards codified at 20.2.3 NMAC, which is applicable to the city of Albuquerque and Bernalillo county. Since the Reeves is under Albuquerque/Bernalillo county air quality control board jurisdiction, it is subject to this rule.
11.20	Fugitive Dust Control	Y	20.11.20 NMAC is applicable to all sources of fugitive dust in Bernalillo county, unless otherwise exempt. It does not apply to sources within Bernalillo county that are stationary source operations subject to 20.11.41 NMAC, <i>Construction Permits</i> , or 20.11.42 NMAC, <i>Operating Permits</i> , that produce fugitive dust as defined in 20.11.20 NMAC, but only if the source of fugitive dust is addressed and controlled through permit conditions required by a 20.11.41 NMAC or 20.11.42 NMAC permit; however construction at a stationary source site, whether it involves new construction or a site modification, is subject to 20.11.20 NMAC. Since PNM Reeves is located within Bernalillo County, the facility is subject to requirements imposed by 20.11.20 NMAC.
11.23	Stratospheric Ozone Protection	N	The objective of this Part is to prevent or reduce deterioration of the stratospheric ozone layer, and it is applicable to persons engaged in the sale, servicing, or wrecking of automotive air conditioning systems, or automotive air conditioning refrigerants. The Permittee does not perform maintenance and servicing of the vehicles including automotive air conditioning refrigerants replacement. Hence, this Part is not applicable to the facility.
11.40	Source Registration	Y	By January 1, 1974, any person owning or operating any commercial or industrial stationary source, which emits more than

20 NMAC	Title	Applies (Y/N)	Comments
			two thousand pounds of any air contaminant per year or any amount of a hazardous air pollutant, must obtain a Registration Certificate for the source from the Director per 20.11.40 NMAC. This Part is applicable to any stationary source located in Bernalillo County. Source Registration #2148 was issued on March 8, 2011 for the two auxiliary boiler units.
11.41	Construction Permits	Y	20.11.41 requires that any person planning to construct a new stationary source or modify an existing stationary source of air contaminants such that any of the emissions thresholds, classifications, or kinds of permits apply, shall obtain a permit from the Department prior to commencement. The last NSR permit issued was 2025-RV1 in 2009 for diesel fired emergency engine replacement.
11.42	Operating Permits	Y	20.11.42 NMAC requires that operating permits must be obtained from the Department for any major source. The objective of this Part is to assure that major air pollution sources within Bernalillo County obtain an operating permit setting forth minimum requirements and conditions of operation pursuant to Title V of the Clean Air Act Amendments of 1990 (42 U.S.C. 7401, et seq.). PNM Reeves has the total potential emissions that are greater than 100 tons per year for NO _x , CO, and PM ₁₀ . Therefore, the Facility is considered as a major source for Criteria Pollutants and is subject to requirements of 20.11.42 NMAC.
11.46	Sulfur Dioxide Emissions Inventory Requirements: Western Backstop Sulfur Dioxide Trading Program	N	20.11.46 NMAC implements the western backstop SO ₂ trading program ("WEB trading program") provisions required under the federal Regional Haze Regulation, 40 CFR 51.309, the Albuquerque-Bernalillo county element of the state of New Mexico's regional haze implementation plan and related requirements associated with the time period prior to the WEB trading program trigger date. 20.11.46 NMAC is applicable to all geographic areas within Bernalillo County, New Mexico and within the jurisdiction of the Albuquerque-Bernalillo county air quality control board. The Facility is not a major source of SO ₂ , thus is not subject to this Part.
11.47	Emissions Inventory Requirements	Y	20.11.47 NMAC applies to the owner or operator of every stationary source, located within Bernalillo county that: (1) has an active permit issued pursuant to 20.11.41 NMAC, <i>Authority to Construct (2002)</i> , or 20.11.42 NMAC, <i>Operating Permits</i> ; or (2) is required to file a source registration pursuant to 20.11.40 NMAC, <i>Source Registration</i> . A source that meets requirements above is required to submit an emissions report annually. A source is not required to submit an

20 NMAC	Title	Applies (Y/N)	Comments
			emissions report more frequently than annually. Since PNM Reeves currently has an active operating permit, the provisions of this Part are applicable to the Facility.
11.49	Excess Emissions	Y	20.11.49 NMAC is used to implement requirement for the reporting of excess emissions and establish affirmative defense provisions for facility owners and operators for excess emissions. Any source subject to 20.11.47 NMAC, 20.11.41 NMAC, 20.11.42 NMAC, 20.11.61 NMAC, and 20.11.60 NMAC are subject to the requirements to this part. Since PNM Reeves is subject to one or more of the above regulations, it is subject to the requirements of 20.11.49 NMAC.
11.60	Permitting in Non-Attainment Areas	N	The requirements of 20.11.61 NMAC apply to the construction of any new major stationary source or major modification at an existing major stationary source in an area designated as non-attainment. The Bernalillo County is currently classified as an attainment or unclassifiable area for all criteria pollutant thus this 20.11.60 NMAC does not apply.
11.61	Prevention of Significant Deterioration	N	The requirements of 20.11.61 NMAC apply to the construction of any new major stationary source or major modification at an existing major stationary source in an area designated as attainment or unclassifiable. The Bernalillo County is currently classified as an attainment or unclassifiable area for all criteria pollutant. PNM Reeves is located in an attainment area but has not undergone a major modification as defined by the PSD rules. However, it is a listed source under PSD and if it undergoes a major modification, it will be subject the requirements of 20.11.61 NMAC.
11.62	Acid Rain	Y	20.11.62 NMAC is applicable to all stationary sources of air pollutants located within Bernalillo County, which are affected by the Federal Acid Rain Program. These requirements herein are to be implemented through the Acid Rain Portion of the operating permit.
11.63	New Source Performance Standards for Stationary Sources	Y	20.11.63 NMAC is applicable to all stationary sources of air pollutants located within Bernalillo County, which are subject to the requirements of 40 CFR Part 60, as amended in the Federal Register through July 1, 2004.
11.64	Emission Standards for Hazardous Air Pollutants for Stationary Sources	N	20.11.64 NMAC is applicable to all stationary sources of air pollutants located within Bernalillo County, which are subject to requirements of 40 CFR Part 61 or Part 63, as amended in the Federal Register through July 1, 2004. PNM Reeves is exempt from 40 CFR 63 Subpart DDDDD in accordance with 63.7491(a) that exempts Natural Gas electric steam generating units, thus 20.11.64 NMAC is not applicable.

20 NMAC	Title	Applies (Y/N)	Comments
11.65	Volatile Organic Compounds	N	The objective of this Part is to prevent or reduce emission of hydrocarbon vapors from facilities and sources not otherwise regulated or exempted by 40 CFR Part 60; including volatile organic compounds and petroleum liquids, in order to prevent the formation of photochemical oxidants in the atmosphere. 20.11.65 NMAC is applicable to any source located within Bernalillo County. PNM Reeves has no storage tanks over 40,000 gallons capacity that handle and store organic and petroleum liquids, which are subject to the requirements of 20.11.65 NMAC.
11.66	Process Equipment	N	20.11.66 NMAC provides emission standards for various process equipment to achieve attainment of regulatory air pollution standards and to minimize air pollution emissions. The process emissions at the PNM Reeves emit particulate matter emissions below the thresholds of the process weight discharged per hour, thus 20.11.66 NMAC is not applicable.
11.67	Equipment , Emissions, Limitations	Y	20.11.67 NMAC is applicable to any stationary source located in Bernalillo County containing, constructing or modifying the following: Orchard Heaters; Kraft Mills; Coal, Oil, or Gas Burning Equipment. The purpose of this rule is to prevent equipment covered by this Part from being constructed, placed, maintained, altered, used, or operated unless the equipment meets the applicable emission limitations established by 20.11.67 NMAC. The fuel for the Facility Units 1 through 3 is natural gas and each unit has a heat input more than 1×10^{12} BTUs/year and is therefore subject to 20.11.67 NMAC. PNM Reeves Units 1 through 3 must meet the NO _x limitation requirement of 0.3 lb/MMBtu of heat input as specified by this regulation.
11.90	Administrative, Enforcement, Inspection	Y	The objective of this Part is to minimize emissions from sources through inspection, enforcement, and good operating procedures, and this Part is applicable to any source within Bernalillo County, which includes PNM Reeves.
In addition to specifically applicable NMAC regulations cited above, there are additional relevant NMAC that do not impose any specific requirements on the operation of Reeves Generating Station, but rather provide general guidance. The following is the list of such NMAC regulations			
11.43	Stack Height Requirements	As required	Specifies local requirements that are identical to those required by federal new source review regulations assuring uniform procedures and formulae in determining, on a case-by-case basis, what stack heights or other dispersion techniques are creditable under the term "good engineering practice".

13.0 Federal Regulatory Analysis – Code of Federal Regulations (CFR):

40 CFR 50 –	Title	Applies	Comments
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National Ambient Air Quality Standards		(Y/N)	
All Sections	National Primary and Secondary Ambient Air Quality Standards	Y	40 CFR Part 50 establishes primary and secondary National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment. The Tijeras facility is subject to these standards and emissions are controlled and restricted to maintain its region's attainment/unclassified status for the Bernalillo County. Facility demonstrated compliance with these standards by performing ambient air dispersion analyses.

40 CFR 51 – Review of New Sources and Modifications (Sections 160 - 166)	Title	Applies (Y/N)	Comments
I (Sections 160 through 164)	Review of New Sources and Modifications	Y	Sections 160 through 164 are the general plan requirements for review of minor stationary sources. Although PNM Reeves is not a minor source, but a major stationary source by definition in Subpart I, changes that are made to the facility that do not trigger the requirements of Sections 165 and 166 must follow the requirements of the delegated agency's New Source Review program. PNM Reeves has obtained Authority to Construct permit #2025-RV1 for the existing backup emergency generator; therefore, the facility is subject to requirements imposed by the SIP requirements of the minor NSR program.

(Section 165)	Permit Requirements	N	Section 165 sets forth the plan requirements for major stationary source permitting in non-attainment areas. PNM Reeves is a fossil fuel fired steam electric plant with more than 250 MMBtu/hr heat input, which is one of the 28 listed source categories. Therefore, major stationary source status is classified at the 100 tons per year emission threshold for any NSR regulated pollutant.
(Section 166)	Prevention of significant deterioration of air quality	Y	<p>The PSD regulations are contained in 40 CFR 51.166. These regulations specify federally required permitting procedures for a "major stationary source" in an attainment or unclassifiable area.</p> <p>PNM Reeves is a fossil fuel fired steam electric plant with more than 250 MMBtu/hr heat input, which is one of the 28 listed source categories. Therefore, major stationary source status is classified at the 100 tons per year emission threshold for any NSR regulated pollutant.</p> <p>PNM Reeves is considered a major stationary source since the potential to emit of NO_x, PM₁₀, and CO emissions (NSR regulated pollutants) from the facility exceeds 100 tons per year. Therefore, this facility will be subject to requirements of PSD permitting regulations if it were to undergo a major modification. There have been no major modifications subject to PSD review based on the best available historical records.</p>

40 CFR 60 – New Source Performance Standards (Subparts)	Title	Applies (Y/N)	Comments
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40 CFR 60 – New Source Performance Standards (Subparts)	Title	Applies (Y/N)	Comments
A	General Provisions	Y	40 CFR Part 60 Subpart A establishes general provisions for all sources subject to a NSPS standard
Da	Standards of Performance for Electric Utility Steam Generating Units for Which Construction Commenced After September 18, 1978	N	PNM Reeves was constructed prior to the trigger date of Subpart Da and has not undergone a modification as defined by 40 CFR 60.14 or reconstruction as defined by 40 CFR 60.15. Thus, PNM Reeves is not subject to Subpart Da.
IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines Manufactured after April 1, 2006	Y	Emission Unit #S109 is a stationary compression ignition engine that was manufactured after April 1, 2006 and has a displacement of less than 30 liters per cylinder.

40 CFR 63 – National Emission Standards for Hazardous Air Pollutants (Subparts)	Title	Applies (Y/N)	Comments
A	General Provisions	N	No NESHAP requirements apply to this facility.
DDDDD	Testing and Fuel Analysis, Initial Testing Requirements	N	The Facility is not subject to this NESHAP since 40 CFR 63.7491(a) exempts Natural Gas electric steam generating units from the applicability of this subpart.
UUUUU	Coal and Oil Fired Electric Utility Steam Generating units.	N	The Facility does not fire coal or fuel oil in the boilers.

40 CFR 64 – Compliance Assurance Monitoring	Title	Applies (Y/N)	Comments
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All Subparts	Compliance Assurance Monitoring	N	The Facility is subject to the Acid Rain monitoring requirements under 40 CFR 75.40 CFR Part 64. Although, Section 64.2(3)(b)(iii) exempts sources subject to the Acid Rain program.
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40 CFR 70 – State Operating Permit Programs	Title	Applies (Y/N)	Comments
All Subparts	State Operating Permit Programs	Y	Establishes comprehensive State air quality permitting systems consistent with the requirements of Title V of the Clean Air Act

40 CFR 72 – Permits Regulation	Title	Applies (Y/N)	Comments
All Subparts	Permits Regulation	Y	Establishes certain general provisions and the operating permit program requirements for affected sources and affected units under the Acid Rain Program, pursuant to title IV of the Clean Air Act, 42 U.S.C. 7401, <i>et seq.</i> , as amended by Public Law 101–549 (November 15, 1990).

40 CFR 75 – Continuous Emissions Monitoring (Subparts)	Title	Applies (Y/N)	Comments
A	General Provisions	Y	Applies to each affected unit subject to Acid Rain emission limitations or reduction requirements for SO ₂ or NO _x .
B	Monitoring Provisions	Y	PNM Reeves uses CEMs for all three units to measure NO _x . This subpart establishes the primary measurement requirements.
C	Operation and Maintenance Requirements	Y	This subpart establishes the certification requirements, QAQC requirements for CEMs.
D	Missing Data Substitution Procedures	Y	This subpart establishes the data substitution procedures for data collection.

40 CFR 75 – Continuous Emissions Monitoring (Subparts)	Title	Applies (Y/N)	Comments
E	Alternative Monitoring Systems	Y	If CEMs are not used, then this subpart can be used by PNM for approval of an alternative monitoring system (or system component) to determine average hourly emission data for SO ₂ , NO _x , and/or volumetric flow by demonstrating that the alternative monitoring system has the same or better precision, reliability, accessibility, and timeliness as that provided by the continuous emission monitoring system.
F	Recordkeeping Requirements	Y	The owner or operator of any affected source subject to the requirements of 40 CFR 75 shall maintain for each affected unit a file of all measurements, data, reports, and other information required by this part at the source in a form suitable for inspection for at least three (3) years from the date of each record.
G	Reporting Requirements	Y	The designated representative for any affected unit subject to the requirements of 40 CFR 75 shall comply with all reporting requirements in this section and with the signatory requirements of 40 CFR 72.21 of for all submissions.

40 CFR 98 – Mandatory Greenhouse Gas Reporting	Title	Applies (Y/N)	Comments
A	General Provisions	Y	Establishes mandatory greenhouse gas reporting requirements for owners and operators of certain facilities that directly emit GHG as well as for certain fossil fuel suppliers and industrial GHG suppliers.

D	Electricity Generation	Y	Applies to electricity generating units that are subject to the requirements of the Acid Rain Program and any other electricity generating units that are required to monitor and report to EPA CO2 emissions year-round according to 40 CFR 75.
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14.0 Title V - INSIGNIFICANT ACTIVITIES (Dated January 3, 1996) as defined by 20.11.42.7.Q NMAC:

Pursuant to Albuquerque/Bernalillo County Air Quality Control Regulations Title 20, Chapter 11, Part 42 (Part 42), Operating Permits, the Director of the Environmental Health Department (Department) may list certain activities located at major source as insignificant based on the activities' actual limitations, emission rates, or production rates and approved by the Administrator of the US Environmental Protection Agency (EPA). The Department may not consider any activity for which applicable requirements apply as insignificant, regardless of whether the activity meets the criteria listed below. The EPA stresses in its "White Paper for Streamlined Development of Part 70 Permit Applications," dated July 10, 1995, (White Paper) that there is "inherent flexibility" for states to determine trivial activities without EPA approval. In addition, the White Paper also reminds the states that the process of determining and listing insignificant activities should be streamlined to minimize paperwork. Following is a description of insignificant activities followed by a list of trivial activities pursuant to 20.11.42 NMAC:

A. The following activities are included in a Part 42 operating permit application as insignificant. These activities have been designated by the Department as Insignificant Activities:

1. Any emission unit, operation, or activity that has the potential to emit no more than one (1) ton per year of any regulated criteria pollutant. Multiple emission units, operations and activities that perform identical or similar functions shall be combined in determining the applicability of this exemption, unless a De Minimis emission level for specific sources is assigned by the Department.
2. If the total annual purchase of any substance or precursor substance listed as a hazardous air pollutant under Section 112(b) of the federal Clean Air Act, does not exceed 10 tons per year of any single substance or 25 tons per year aggregate substances, the use of the listed substance(s) shall be considered an insignificant activity for the purposes of 20 NMAC 11.42 (Part 42) permits. However, the List of Insignificant Activities, hazardous air pollutants emissions must be generally quantified and listed in the application as an insignificant activity.
3. Surface coating of architectural structures and fixed facility equipment, this includes spray painting, roll coating, and painting with aerosol spray cans, for sources with facility-wide total actual emissions of cleanup solvent and coating materials of less than two thousand (2,000) pounds per year.
4. Fuel burning equipment which uses gaseous fuel, has a design rate less than or equal to five (5) million Btu per hour, and is used solely for heating buildings, for personal comfort or for producing hot water for personal use.

5. Fuel burning equipment which uses distillate oil, has a design rate less than or equal to one (1) million Btu per hour, and is used solely for heating buildings for personal comfort or for producing hot water for personal use.

6. Internal combustion engines on equipment utilized as the primary power source, secondary power source or as stand-by emergency units that have an annual potential to emit less than two thousand (2,000) pounds of any criteria pollutant, based on five hundred (500) hours of operating time per calendar year.

7. Any sources which are requested by the facility prior to submittal of an operating permit application and are approved by the Director. The sources must not have any applicable requirements, not contribute to the major source status of the given facility, or be the primary function of the facility. The sources must be clearly identified and justification for consideration as insignificant activities must be provided.

B. The following activities need not be included in a Part 42 operating permit application. These activities have been designated as Trivial Activities by the Department.

1. Activities which occur strictly for maintenance of grounds or buildings, to include: lawn care, pest control, grinding, cutting, welding, painting, general repairs and janitorial activities.

2. Pollution control equipment maintenance, such as welding, painting, or parts removal and replacement. Pollution control equipment maintenance does not include utilizing the control equipment as relief valves, blow down equipment, or any other continuous utilization that causes exceedances of any regulatory opacity limits.

3. Exhaust emissions from forklifts, courier vehicles, front end loaders, graders carts and maintenance trucks.

4. User of fire control equipment including routine maintenance of emergency booster pumps.

5. General office activities to include, but not limited to, photocopying, computer printing operations, and refuse collection.

6. Characterization of waste disposal sites.

7. Non-anthropogenic wind-blown dust.

8. Automotive repair activities, performed by the owner of the vehicle at a nonprofessional hobby shop or place of residence within military installations or a facility's contiguous property boundary line.

9. Residential activities which involve the use of items such a fireplaces, woodstoves, or barbecues to include those residential activities located within a contiguous property boundary line or sets of contiguous property boundary lines of a classified facility. Such activities will however comply with all applicable requirements under Part 22 (Woodburning).

10. Food service and cafeteria activities.

11. Any activity which is requested by the facility prior to submitting an operating permit application is approved by the Director. These activities may not have any applicable requirements, not contribute to the major status of the given facility, or be the primary function of the facility. These activities must be clearly identified and justification for consideration as an Insignificant Activity must be provided. The Permittee's application designated the insignificant activities and are listed in Table 3 of the Draft permit and the table below:

Units	Process	Pollutant/Parameter
S110	Emergency Generator Fuel Tank	VOC < 1 tpy
S301	Cyclohexylamine Water Treatment	HAP < 1 tpy
S302	Hydrazine Water Treatment	HAP < 1 tpy
S303	Phosphate Process Vessel Loading	PM ₁₀ < 1 tpy
S401	Turbine Lube Oil System Leaks	VOC < 1 tpy
S402	Fugitive dust road emissions	TSP < 1 tpy PM ₁₀ < 1 tpy
N/A	Fire control equipment	
N/A	Aerosol sprays	
N/A	Maintenance of buildings and grounds	

15.0 Title V/NSR Interface: Below is the table to cross reference NSR permit conditions with the Title V permit.

NSR Condition Number	Title V Section Number
<p>ATC Permit #2025-RV1 <u>Condition I.1.h.i</u> – Unit #1 (S109 in 0499-RN2) shall be restricted to a maximum of 500 hours of operation per 12-month rolling total, and shall only be operated during loss of commercial power and as required by the manufacturer for engine exercising/maintenance. Pursuant to CFR Title 40 Part 60 Subpart IIII §60.4211(e), of the 500 hours of operation per 12-month rolling total Unit #1 shall be limited to 100 hours of maintenance checks and readiness testing. The unit shall <u>not</u> be operated to generate power for peak shaving or sale to third parties, but only to provide emergency power for the facility. Routine or non-emergency operation of the unit or operation for any other purposes, except as stated above, shall be a violation of this permit</p>	3.3 Operational Requirements

NSR Condition Number	Title V Section Number
<p><u>Condition 1.1.h.ii</u> – Upon startup, the permittee shall meet the diesel fuel requirements as required by CFR Title 40 Part 60 Subpart IIII §60.4207(a) [requirement for low sulfur diesel fuel as provided in CFR Title 40 Part 80-Regulation of Fuels and Fuel Additives, Subpart I § 80.510(a)]. Additionally, beginning with first fueling on or after October 1, 2010 effective October 1, 2010 the permittee shall meet the diesel fuel requirements as required by CFR Title 40 Part 60 Subpart IIII §60.4207(b) [requirement for ultra-low sulfur diesel fuel as provided in CFR Title 40 Part 80-Regulation of Fuels and Fuel Additives, Subpart I § 80.510(b)]</p> <p><u>Condition 1.1.h.iii</u> – The permittee shall operate and maintain Unit #1 according to the manufacturer’s written instructions, or procedures developed by the permittee that have been approved by the manufacturer. In addition, the permittee may only change those settings that are allowed by the manufacturer. The permittee must also meet the requirements of CFR Title 40 part 89, 94, and/or 1068 as they apply. This condition is Pursuant to CFR Title 40 Part 60 Subpart IIII §60.4211.</p>	
<p><u>ATC Permit #2025-RV1</u></p> <p><u>Condition 1.2.b)</u> – In accordance with 40CFR 60, Subpart IIII §60.4205(b), Unit #1 shall comply with the emission standards in 40 CFR 89.112(a) for the maximum permitted engine power. Unit #1 shall not exceed the more stringent of the allowable CO, NMHC+NOx, and PM emission standards in 40 CFR 89.112(a) for the maximum permitted engine power or the pound per hour (lb/hr) and opacity emission limits as specified in Condition 2(a) in the table above.</p> <p><u>Condition 1.2.c)</u> – For Unit #1, compliance with TSP, PM₁₀, and PM_{2.5} pound per hour (lb/hr) emissions limits, shall be shown by meeting the</p>	3.2 Emission Limits

NSR Condition Number	Title V Section Number
<p>requirements of CFR Title 40 Part 60 Subpart IIII §60.4211(c). Compliance with CO and NOx+NMHC pound per hour (lb/hr) limits shall be shown by meeting the manufacturer's emissions data.</p> <p><u>Condition I.2.d)</u> – Unit #1 shall not cause or allow visible air emissions from any stationary diesel powered engine to exceed 20 percent opacity for any six (6) minute timed average. During the first twenty (20) minutes of cold start-up, the visible emissions shall not exceed 40 percent opacity for any (6) minute timed average. No increase of load shall be applied so as to cause an emission having an opacity greater than 40 percent during any time interval. This condition is pursuant to 20.11.5.13.C NMAC.</p>	
<p><u>ATC Permit #2025-RV1</u></p> <p><u>Condition I.3.a)</u> – Maintain an accurate monthly log for Unit #1 hours of operation, both as a monthly total and as a 12-month rolling total.</p>	4.0 Recordkeeping
<p><u>ATC Permit #2025-RV1</u></p> <p><u>Condition I.4.b)</u> – Monitor the annual hours of operation for Unit #1.</p>	3.4 Monitoring
<p><u>ATC Permit #2025-RV1</u></p> <p>Condition I.5.f) – The permittee shall file an initial report, no later than the end of the next regular business day after the time of discovery of an excess emission pursuant to 20.11.49.15.A(1) NMAC.</p> <p>The permittee shall file a final report, no later than 10 days after the end of the excess emission. If the period of an excess emission extends beyond 10 days, the permittee shall submit the final report to the department within 72 hours of the date and time the excess emission ceased. This condition is pursuant to 20.11.49.15.A(2) NMAC and 20.11.49.15.C NMAC</p> <p>If the facility is subject to the reporting requirements of 40 CFR Parts, 60, 61, and 63 and the federal requirements duplicate the requirements of 20.11.49.15 NMAC, then the federal reporting requirements shall suffice. This condition is pursuant to 20.11.49.15.D NMAC</p>	5.0 Reporting

16.0 EMISSION LIMITS

Emissions Units S101, S102, S103, S109, and S305 through S307 are subject to the following emissions limits pursuant to 20.11.42.12.C.(1).(a), (b), (g) NMAC and ATC Permit #2025-RV1:

EU	NOx lb/hr	NOx tpy	CO lb/hr	CO tpy	SO ₂ lb/hr	SO ₂ tpy	VOC lb/hr	VOC tpy	PM ₁₀ lb/hr	PM ₁₀ tpy	PM _{2.5} lb/hr	PM _{2.5} tpy
S101	181.7	636.7 ¹	375	1314 ²	0.49	1.7 ²	4.5	15.6	6.2	21.7 ²	6.2	21.7 ²
S102	165.2	578.9	375	1314	0.49	1.7	4.5	15.6	6.2	21.7	6.2	21.7
S103	639.0	2239.0	275	963.6	0.7	2.5	6.5	22.3	8.8	30.8	8.8	30.8
S109 ²	7.89	1.97	4.33	1.08	0.19 ³	0.048	0.10	0.025	0.25	0.06	0.25	0.06
S305	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.61	2.1	0.004	0.01
S306	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.61	2.1	0.004	0.01
S307	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.93	3.3	0.006	0.02
Totals	993.8	3456.6	1029.3	3592.7	1.87	5.95	15.6	53.5	23.6	81.8	21.5	74.3

¹ NO_x, CO, SO₂, and PM tpy limitation based on 80% utilization of the maximum annual fuel consumption for each unit. Emission factor for NO_x is from Stack Tests plus safety factor of 1.5. Other criteria pollutants emission factors from AP-42 Chapter 1.4, Table 1.4-1, Utility Industrial boilers plus 1.5 safety factor.

² Applicable to 40 CFR 60 Subpart IIII requirement for combined NO_x and NMHC under ATC Permit #2025-RV1 (NO_x+NMHC = 7.99 lbs/hr, 1.88 tpy). Compliance with CO and NO_x+NMHC pound per hour (lb/hr) limits shall be shown by meeting the manufacturer's emissions data. NO_x and NMHC (VOC) emissions shall be reported separately. The maximum reportable emission rates for NO_x are 7.89 lb/hr and 0.10 lb/hr for NMHCs which are shown in the table (tpy is based on 500 hrs/yr).

³ SO₂ emissions have decreased due to a lower sulfur content of the No. 2 distillate fuel of 15 ppm.

HAP emission from the boilers were calculated in the application and determined to be a total of 6.41 tpy. These HAP emissions have been added to the annual fee table. For more info, refer to permit application page 57.

Refer to 0499-M2-RN2 application pages 51 through 57 for emission calculations.

17.0 Data Base Summary

Permit Writer: Barbara Georgitsis
Operating Permit No.: 0499-M2-RN2
AIRS Number: 35/001/00011
SIC Code: 4911 – Electric Services
Facility Type: Electric Utility
Company: Public Service Company of New Mexico
Facility: Reeves Generating Station
Type of Permit Action: Title V Permit Renewal
Application Date: February 8, 2021
Ruled Incomplete: N/A
Ruled Complete: April 8, 2021
Application Sent to EPA: __, 2023
Public Notice: __, 2023
Comments Due: __, 2023
Public Hearing: N/A
Proposed Permit to EPA: __, 2023
Permit Due:
Permit Issued:
Permit to EPA:
Facility Location: 4400 Paseo del Norte NE
Lat: 35°10'17"
Long.: 106°36'04"
Elevation: 5085 feet
County: Bernalillo
Contact Names: Heath Lee
 Phone: (505) 241-4723
 Email: heath.lee@pnm.com
Contact Address: 2401 Aztec Rd. NE
 Albuquerque, NM 87107

18.0 Title V Affected Program Notification

Affected Program	Distance	Units	Date Letter Sent
Santo Domingo Pueblo	37	miles	
Zia Pueblo	34	miles	
Santa Ana Pueblo	26	miles	
San Felipe Pueblo	28	miles	
Navajo Nation	>50	miles	
Laguna Pueblo	47	miles	
Jemez Pueblo	45	miles	
Isleta Pueblo	15	miles	

Affected Program	Distance	Units	Date Letter Sent
Acoma Pueblo	50	miles	
Cochiti Pueblo	45	miles	
Sandia Pueblo	13	miles	
State of New Mexico	>50	miles	

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