

FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY

SITE OPERATING PERMIT (SOP) RENEWAL

Permit #:	03670	Company:	El Paso Electric Company
Project #:	30978	Site:	Montana Power Station
Regulated Entity #:	RN106392624	Application Area:	Montana Power Station
Region:	6	Customer #:	CN600352819
NAICS Code:	221112	County:	El Paso
Permit Reviewer:	Alfonzie "Al" Stepney III	NAICS Name:	Fossil Fuel Electric Power Generation

SITE INFORMATION

Physical Location: 13511B Montana Ave
Nearest City: El Paso
Major Pollutants: CO, NOX, PM
Additional FOPs: None

PROJECT SUMMARY

El Paso Electric Company (EPEC) owns and operates Montana Power Station in El Paso County, Texas. On August 3, 2020 EPEC submitted a renewal application for federal operating permit (FOP) 03670 that is subject to 30 TAC Chapter 122. The permit was initially issued on March 23, 2016 and a timely renewal application was received on August 3, 2020. This is the first renewal for the FOP and there have been no revisions during the interim, however OP-NOTIFY projects 30733 and 30978 were received prior to and are addressed in this renewal.

The company indicated on Form OP-REQ1 that the site has emission units in the application area subject to the Acid Rain Program and the Cross-State Air Pollution Rule (CSAPR) Trading Program. Units at the site are also subject to periodic monitoring or compliance assurance monitoring. Significant emission sources with Federal and/or State applicability at the site include engines, stationary turbines, and process vents. Natural gas-fired turbines in GRP-GT are subject to Compliance Assurance Monitoring (CAM), and the requirements are identified in the FOP. The FOP includes general and special terms and conditions and unit-specific applicable requirements which were identified using information provided by the applicant in various forms (OP-SUM, OP-REQ1, OP-REQ2, OP-REQ3, and Unit Attribute forms OP-UA2 and OP-UA3).

PROCESS DESCRIPTION

The Montana Power Station consists of four GE gas-fired simple-cycle turbines and associated equipment, including cooling towers, a firewater pump engine, an ammonia storage and unloading system, and a diesel storage tank. The turbines use a conventional aqueous ammonia-based selective catalytic reduction (SCR) system to control NOx emissions. The system is comprised of aqueous ammonia storage and handling equipment, an ammonia vaporizer, an ammonia injection grid, and catalyst bed modules. Aqueous ammonia will be delivered by tanker truck, which will use vapor balance to capture emissions during filling of the storage tanks. In addition, the aqueous ammonia will be stored in pressurized tanks equipped with pressure relief valves to prevent emissions. The turbine intercoolers use two evaporative cooling towers to reject heat from the turbine compressor section and allow for higher mass flow of combustion air. The site is equipped with one firewater pump that is serviced by a diesel storage tank with a submerged fill-pipe.

TECHNICAL REVIEW

Permit Content Summary

1. Was Periodic Monitoring (PM) required and included in the permit?..... Yes
2. Was Compliance Assurance Monitoring (CAM) required and included in the permit?..... Yes
3. Was case-by-case PM or CAM included in the permit?..... Yes
4. Was a permit shield requested?..... Yes
5. If a permit shield was requested, was any permit shield request denied?..... Yes
6. Identify if the following are applicable for this project:
 - (a) Manually-built applicable requirements..... No
 - (b) Customized Special Terms and Conditions..... Yes
 - (c) Manual changes to the IMS-generated applicable requirements..... No
 - (d) Alternate means of compliance for any emission unit/source at the site..... No
7. Is the site subject to the requirements of 40 CFR Part 72 (Acid Rain Permit)?..... Yes
8. Did the applicant's review/comments on the working draft permit result in changes

to the permit content?.....Yes

9. Will the draft permit be sent to public notice with unresolved issues
(i.e., disagreements with applicant)?..... No

Permit reviewer notes:

- GRP-GT (gas turbine exhaust stacks) are subject to periodic monitoring (PM) with respect to 30 TAC Chapter 111, Visible Emissions. The existing Standard Monitoring Option PM-P-029 was deemed valid however the deviation limit was insufficient. The Technical Contact was notified of this and approved the deviation limit to read: "If alternative fuel is fired for > 24 consecutive hours, report as a deviation, or conduct observation using Test Method 22. Report as a deviation if visible emissions are observed using Test Method 22 and opacity > 15% using Test Method 9."
- GRP-GT (gas turbine emission units) are subject to Compliance Assurance Monitoring (CAM) with respect to 30 TAC Chapter 116, Standard Permits. The existing case-by-case CAM was deemed valid and carried forward into the draft permit. There were no new proposals or updates for case-by-case CAM.
- A previously granted permit shield for PARTWASH with respect to 30 TAC Chapter 115, Subchapter E, Division 6 was re-evaluated and denied. The unit in El Paso County will never be potentially subject to the regulation. All other existing permit shields requested were reviewed and carried forward.
- An existing customized special term and condition was maintained for the incorporation of 40 CFR 63, Subpart ZZZZ into 30 TAC Chapter 113, Subchapter C.
- Special Terms and Conditions Nos. 22 and 23 were manually edited and updated to contain the current Acid Rain and Cross-State Air Pollution Rule (CASPR) requirements.
- Additionally, Special Term and Condition 11.A (IMS term AA.143.A – CAM SCHEDULE-2*) was noted to be obsolete and was updated to the current term (IMS term AA.140.A).
- The only technical issue of note was a unit attribute error on OP-UA2, Table 5, for the newly added emergency engine, Unit ID: EG-1. It was first thought to be a logic error and a logic request was submitted. The logic team determined that the applicant had selected the wrong code for the "Install Date" with respect to NSPS IIII. Once the right attribute was inserted the unit resolved. The applicant was notified to provide an update for Table 5b.
- The applicant noted a problem in the Working Draft Permit (WDP) during their review. They discovered that CAM with respect to CO was missing from the CAM Summary Tables for GRP-GT, SOP Index Number 123471. The missing CAM proposal involved firing of diesel fuel instead of natural gas. This issue was investigated by Technical Specialist Carolyn Maus. A solution that would allow the permit to contain two separate CAM tables was not readily found. Ms. Maus suggested a more correct solution would be to combine the two firing scenarios into a single CAM proposal and thus have one CAM table in the permit. The adjustment was made to the SOP, SOB, and IMS and the applicant is in agreement with the change.
- Two OP-NOTIFY projects (30733 and 30978) were incorporated to authorize the installation of a new diesel storage tank (Unit ID: DST) under PBR 106.472 and an authorization to install an emergency engine (Unit ID: EG-1) under PBR 106.511.
- The applicant notified me they would like to do a one-time change for the public notice location since the original location is temporarily closed for renovations. The location for this public notice cycle is: El Paso Public Library, Irving Schwartz Branch, 1865 Dean Martin Drive, El Paso, Texas 79936.

To resolve an issue discovered during QA/QC the applicant re-submitted page 1 of Form OP-REQ1 to change response I.A.4 to NO. This caused special term and conditions involving 30 TAC Chapter 111.111(a)(1)(B) to be added to the permit. The application update was certified by Form OP-CRO1 on July 13, 2021.

Another comment from QA/QC was that Form OP-PBRSUP was not submitted even though the application was received on August 3, 2020. Title V applications submitted after August 1, 2020 are required to include Form OP-PBRSUP. In discussions with applicant on this issue it was confirmed that the application had been prepared and submitted prior to August 1, 2020. The applicant even provided a certified mail receipt that showed the application was in the mail on July 28, 2020 and received by the Texas Comptroller Mail Room on July 30, 2020, therefore the application was submitted ahead of the August 1, 2020 deadline.

Statement of Basis

A Statement of Basis sets forth the legal and factual basis for the applicable requirements that are included in the FOP. A Statement of Basis was prepared for this project and is included in the permit file.

Compliance History Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on **April 7, 2021.**

Site rating: **0.00 / High** Company rating: **0.00 / High**

(High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)

2. Has the permit changed on the basis of the compliance history or site/company rating?..... No

Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS?..... No
2. Is a compliance plan and schedule included in the permit?..... No

Delinquent Fee Check

1. The delinquent fee check was performed on **July 8, 2021**.
2. Were there any delinquent fees owed? No

Public Notice Information

1. Were comments received from the applicant after the draft permit was mailed and before Public Notice was published?..... No
2. Was a revised draft permit or public notice authorization package (PN-Errata) sent for any reason?..... No
3. Publication date: **August 25, 2021** Newspaper name: **El Paso Times**
4. Was bilingual public notice published?..... Yes
Publication date: **August 25, 2021** Newspaper name: **El Dario de El Paso**
5. Were comments received during Public Notice period?..... No
(a) Was a public hearing requested?..... No
(b) Was a public hearing held?..... No
(c) Was the public hearing request withdrawn?..... No
(d) Was permit content changed as a result of any public comments?..... No
6. Was re-publication necessary?..... No

Permit reviewer notes:

The CID was reviewed on **October 18, 2021** to verify there were no public comments.

EPA Review

1. Did EPA comment on the draft permit?..... No
2. Was a separate NOPP - Notice of Proposed Permit sent to the EPA?..... No
If yes, did the EPA comment on the proposed permit?..... No
3. Were any changes made to the permit after the EPA Review Period?..... No
If yes, were these changes made within the 60-day Public Petition Period?..... No

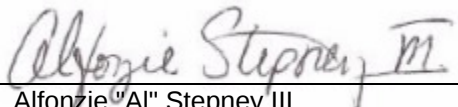
Permit reviewer notes:

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IMPORTANT MILESTONES

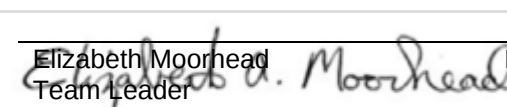
Milestone (Standard)	Start Date	End Date
Date Application Received by TCEQ	August 3, 2020	
Date Project Received by Engineer	August 10, 2020	
Technical Review Period	April 7, 2021	May 7, 2021
Working Draft Permit Reviewed by Applicant	April 23, 2021	May 7, 2021
Date PNAP/Draft Permit Mailed	August 6, 2021	
Public Notice Comment Period	August 25, 2021	September 24, 2021
EPA Review Period	August 25, 2021	October 15, 2021
Date Sign Posting Certification Received	October 1, 2021	

EFFECTIVE PERMIT ISSUANCE DATE: October 27, 2021


 Alfonzie "Al" Stepney III
 Permit Reviewer
 Operating Permits Section
 Air Permits Division

10/20/2021

Date


 Elizabeth Moorhead
 Team Leader
 Operating Permits Section
 Air Permit Division

10/20/2021

Date

CONTACT INFORMATION

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