

**Technical Review and the Evaluation of the  
Application for Air Quality Permit  
Proposed Permit Number 40012**

**I. INTRODUCTION**

This Class I Minor Revision is being issued to Snowflake White Mountain Power (SWMP), the Permittee, for the construction and operation of a 22 Megawatt (MW) wood fired generating station in Snowflake, Navajo County, Arizona. The facility was issued a Class I permit (Number 36183) in February 2006. The company has since determined that various portions of the plant would need to undergo replacement, and thus the facility will meet the definition of reconstruction under the Code of Federal Regulation, Title 40, Part 60 (40 CFR 60.15). Therefore, this revision is to add the New Source Performance Standards under Subpart Db of 40 CFR 60.

**II. EMISSIONS**

This minor revision will have no impact on emissions from the facility.

**III. APPLICABLE REGULATIONS**

A. The applicable regulations under 40 CFR 60, Subpart Db were identified by the agency as part of the permitting process. Table 1 displays the applicable requirements for the facility under this minor revision.

**Table 1: Verification of Applicable Regulations**

Unit	Date of Reconstruction	Control Device	Rule	Verification
Boiler	2006	Multiclone, baghouse, selective non-catalytic reduction system	40 CFR 60 60.43b(f), 60.43b(e), 60.43b(f), 60.43b(g), 60.43b(h)(1), 60.44b(h), 60.44b(i), 60.44b(l)(1), 60.46b(c), 60.46b(e)(1), 60.46b(e)(3), 60.48b(a), 60.48b(b)(1), 60.48b(c), 60.48b(d), 60.48b(e), 60.48b(f), 60.49b(a)(1), 60.49b(a)(3), 60.49b(b), 60.49b(d), 60.49b(f) 60.49b(g) 60.49b(h), 60.49b(i), 60.49b(j), 60.49b(o), 60.49b(v), and 60.49b(w)	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

B. The SWMP was potentially subject to 40 CFR 60.42b(k), which contains sulfur dioxide requirements. However, 40 CFR 60.42b(k) only applies to facilities that fire coal, oil, gas, a mixture of these fuels, or a mixture of these fuels with any other fuels. SWMP fires natural gas during startup. 40 CFR 60.42b(k)(1) exempts fuels with a potential sulfur dioxide emission rate of 0.32 pounds per million Btu heat input or less from the sulfur dioxide emission limits in 40 CFR 60.42b(k). Since natural gas has a potential emission rate less than 0.32 pounds per million Btu, the Department has determined that the sulfur limits in 40 CFR 60.42b(k) do not apply to this facility.

#### **IV. PERIODIC MONITORING**

No changes in the periodic monitoring are occurring as part of this minor revision.

#### **V. MONITORING REQUIREMENTS**

No monitoring changes are being made as part of this minor revision. The company will still be required to install and operate continuous emissions monitors for nitrogen oxides, carbon monoxide, and sulfur dioxide. In addition the company is required to install a continuous opacity monitor.

#### **VI. TESTING REQUIREMENTS**

No changes in testing requirements are being made as part of this minor revision.

#### **VII. MINOR REVISION GATEKEEPERS**

The Department has determined that this revision meets the requirements of a minor revision. Each minor revision trigger is listed below along with a discussion of why this revision meets those triggers.

1. Does not violate any applicable requirement;

The changes proposed by the company that have triggered the requirements of 40 CFR 60, Subpart Db do not violate any applicable requirements.

2. Does not involve substantive changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

40 CFR 60, Subpart Db contains various monitoring, reporting, and recordkeeping that are not required by the Arizona Administrative Code (A.A.C.) R18-2-703, which the company was previously subject to. However, the company voluntarily proposed to install continuous monitors for nitrogen oxide, carbon monoxide, sulfur dioxide, and opacity, as part of their initial permit. Since these requirements were already contained in the permit, the Department has determined that the additional requirements of 40 CFR 60, Subpart Db are not substantive changes to the existing requirements.

3. Does not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;

This minor revision did not require a case-by-case determination of an emission limitation or other standard. Since the emissions from the facility are not changing as part of this revision, no source-specific determination was necessary.

4. Does not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. The terms and conditions include:

This revision did not seek to establish or change a permit term or condition that the source has assumed to avoid an applicable requirement.

- 5. Are not modifications under any provision of Title I of the Act;

The changes made to the facility are not modifications under any provision of Title 1 of the Act.

- 6. Are not changes in fuels not represented in the permit application or provided for in the permit;

There are no changes in fuels associated with this minor revision.

- 7. The increase in the source's potential to emit any regulated air pollutant is not significant as defined in R18-2-101;

The potential to emit from the facility is not changing as part of this revision.

- 8. Are not required to be processed as a significant revision under R18-2-320.

A.A.C. R18-2-320 does not require this revision to be processed as a significant revision.

#### VIII. LIST OF ABBREVIATIONS

A.A.C.	Arizona Administrative Code
ADEQ	Arizona Department of Environmental Quality
Btu	British Thermal Units
CO	Carbon Monoxide
EPA	Environmental Protection Agency
Mw	Megawatts
NO <sub>x</sub>	Nitrogen Oxides
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter Nominally less than 10 Micrometers
SO <sub>x</sub>	Sulfur Oxides
SO <sub>2</sub>	Sulfur Dioxide
SWMP	Snowflake White Mountain Power
VOC	Volatile Organic Compound