

October 20, 2005

Robert Talbot  
Salt River Project  
P.O. Box 52025, PAB 352  
Phoenix, AZ 85072-2025

Re: Modification of Title V Operating Permit (NN-OP 00-01-D) for Navajo  
Generating Station

Dear Mr. Talbot:

We have received your application for a modification of your title V permit, dated July 7, 2005. You have requested a modification of the Title V permit to allow construction of an ash storage and loading facility.

After reviewing the application and discussing the project with you, EPA has determined that this change qualifies as a minor permit modification, pursuant to 40 CFR 71.7(e)(1). The permit modification consists of new conditions 5, 6, and 7 in section II.D. (which has been renamed "NSPS and Ash Storage/Loading Facility Requirements"), and new conditions 4, 5, and 6 in section II.E. ("Monitoring and Testing Requirements"). We have enclosed the revised sections II.D. and II.E., which contain the new conditions and replace existing sections II.D. and II.E. These conditions shall take effect immediately.

If you have any questions, please contact Roger Kohn of my staff at (415) 972-3973 or kohn.roger@epa.gov.

Sincerely,

/ s /

Deborah Jordan  
Director, Air Division

Enclosure

cc: Dan Casiraro, SRP  
Mohan R. Astahna, Navajo Nation EPA  
Calvert Curley, , Navajo Nation EPA

## **II.D. NSPS and Ash Storage/Loading Facility Requirements**

1. The permittee shall not cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility any stack emissions which [40 CFR 60.672(a)] :
  - a. Contain particulate matter in excess of 0.05 g/dscm (0.022 gr/ dscf), and
  - b. Exhibit greater than 7 percent opacity.
2. The permittee shall not cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility any fugitive emissions which exhibit greater than 10 percent opacity. [40 CFR 60.672(b)]
3. The permittee shall not cause to be discharged into the atmosphere from any building enclosing any transfer point on a conveyor belt or any other affected facility any visible fugitive emissions except emissions from a vent as defined in 40 CFR 60.671. [40 CFR 60.672(e)(1)]
4. The permittee shall not cause to be discharged into the atmosphere from any vent of any building enclosing any transfer point on a conveyor belt or any other affected facility emissions which exceed the stack emissions limits in condition II.D.1. [40 CFR 60.672(e)(2)]
5. Particulate emissions from the ash storage building shall be vented to baghouses DC-103 and DC-105.
6. The truck loadout stations shall not be operated unless particulate emissions are vented to baghouse DC 131.
7. Baghouses DC-103, DC-105 and DC-131 shall be maintained in good working order to ensure a minimum control efficiency of at least 99%.

## **II.E. Monitoring and Testing Requirements**

1. Once per five year permit term, and at such other times as specified by EPA, the permittee shall conduct performance tests for particulate matter emissions from the exhaust stacks of baghouses DC9, DC10, and DC 11 using EPA Method 5 or Method 17, and furnish EPA a written report of the results of such test. The tests shall be conducted at the maximum operating capacity of the facility being tested. Upon written request (Attn: AIR-5) from the permittee, EPA may approve the conducting of performance tests at a lower specified production rate. In addition to testing once per five year permit term, if during any 12 consecutive month

period visible emissions are observed three times from any one baghouse, the permittee shall conduct a performance test on that baghouse within 120 days. All observations of visible emissions by the permittee, U.S. EPA, or Navajo EPA shall count toward the 12 month total. [40 CFR 71.6(a)(3)]

2. The permittee shall conduct a weekly visual emission survey of the exhaust stacks of baghouses DC9, DC10, and DC 11. The weekly survey shall be conducted while the equipment is operating, and during daylight hours, by a person certified in EPA Method 9 (Visual Determination of the Opacity of Emissions from Stationary Sources). If any visible emissions are observed, the permittee shall conduct an opacity test using EPA Method 9 within 24 hours while the equipment is operating. [40 CFR 71.6(a)(3)]
3. For each visible emission observation or Method 9 opacity test, the permittee shall record and maintain the following records:
  - a. the date and time of the observation, and the name of the observer
  - b. the unit ID number
  - c. statement of whether visible emissions were detected, and if so, whether they were observed continuously or intermittently
  - d. result of Method 9 test, if required.
4. The permittee shall perform monthly visual inspections of baghouses DC-103, DC-105, and DC-131 to ensure that the baghouses are operating properly and to identify any bags with rips, tears or holes. Any such bag shall be replaced as soon as possible but no later than 24 hours after the rip, tear, or hole is discovered.
5. The permittee shall conduct a monthly visual emission survey of the exhaust stacks of baghouses DC-103, DC-105, and DC-131. The monthly survey shall be conducted during daylight hours. If any visible emissions are observed, the permittee shall take immediate corrective action to eliminate the visible emissions.
6. The permittee shall maintain a maintenance and inspection log for baghouses DC-103, DC-105, and DC-131. At a minimum, each log shall contain the following information:
  - a. the date and a description of any maintenance tasks performed
  - b. the date and time of the monthly baghouse inspection
  - c. the date and time of the monthly visible emission survey
  - d. the name of the person performing the task, inspection or survey