



March 7, 2016

Larry Maurin (AIR-3)  
U.S. EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Via email to [R9airpermits@epa.gov](mailto:R9airpermits@epa.gov)

Re: Comments on Proposed Minor NSR Permit for SRP Navajo Generating Station

Mr. Maurin –

On behalf of the National Parks Conservation Association and our million members and supporters we respectfully submit the following comments regarding EPA's proposed air quality minor new source review permit for the Navajo Generating Station (NGS). We appreciate the opportunity to submit comments.

NPCA's mission is to protect and enhance America's national parks for the use and enjoyment of present and future generations. Our members and supporters regularly visit and care deeply about Grand Canyon National Park, Mesa Verde National Park, and the other units of the National Park Service in and near the Four Corners region.

It is our understanding that the refined coal treatment system (RCTS) is anticipated to result in reduced nitrogen oxides (NOx) emissions from NGS. We question why this option was not considered as part of the recent determination for best available retrofit technologies (BART) for NOx control under the regional haze program, since it appears that RCTS is not a new control technique. We maintain that selective catalytic reduction is the appropriate NOx control for these units and should be required through the regional haze program.

Although we do not agree that the NOx "cap" set up under the BART determination is an appropriate or legal alternative to BART, if it is used going forward, we ask EPA to re-calculate and lower the cap, which was based on anticipated future NOx emissions from the facility. We note that without this step, NGS will be able to continue to operate under the NOx "cap" for longer than was previously advertised. For that reason, we find it problematic that this proposal comes shortly after the final BART determination, and request information about any other NOx reduction projects at NGS that SRP has submitted applications for.

The materials in the docket also indicate that SRP does not have plans to permanently operate the RCTS, but rather anticipates dismantling it when the associated federal tax credit is no longer available. If the RCTS provides an overall benefit to visibility, we ask that EPA require NGS to continue use it as part of the regional haze program regardless of the availability of the federal tax credit.

We appreciate your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Nathan Miller". The signature is fluid and cursive, with the first name "Nathan" and last name "Miller" clearly distinguishable.

Nathan Miller  
Engineering & Science Manager, Clean Air Program  
National Parks Conservation Association  
Phone: 312.263.0111 | Cell: 773.230.5823