



**TECHNICAL REVIEW AND EVALUATION
 OF APPLICATION FOR
 AIR QUALITY PERMIT REVISION No. 100706**

I. INTRODUCTION

Class I Significant Permit Revision (SPR) No. 100706 to Permit No. 89460 is for the continued operation of Salt River Project’s (SRP) Coronado Generating Station. This SPR removes conditions inappropriately identified as requiring 2-day permit deviation reporting and streamlines reporting requirements associated with the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart UUUUU for Coal- and Oil-Fired Electric Utility Steam Generating Units.

- A.** Company Name: Salt River Project
- Company Address: P.O. Box 1018
St. Johns, AZ 85936
- Facility Name: Coronado Generating Station
- Facility Location: Six miles northeast of St. Johns off U.S. Highway 191
St. Johns, AZ 85936

B. Attainment Classification

The Coronado Generating Station is located in Apache County, which is classified as in attainment or unclassified for all criteria air pollutants.

II. REVISION DESCRIPTION

SRP is proposing to remove several conditions associated with the operation of continuous monitoring systems (CMS) that have been identified in Condition I.E.1 of Attachment “B” of Operating Permit No. 89460 as being subject to prompt permit deviation reporting requirement in accordance with Condition XI.B.2 of Attachment “A” of the permit and Arizona Administrative Code (A.A.C.) R18-2-306.A.5.b.

A.A.C. R18-2-306.A.5.b states: “Prompt reporting of deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of the deviations, and any corrective actions or preventive measures taken. *Where the applicable requirement contains a definition of prompt or otherwise specifies a timeframe for reporting deviations, that definition or timeframe shall govern...*” The permit conditions identified are associated with the operation of continuous emissions monitoring systems (CEMS) as required by NESHAP Subpart UUUUU, New Source Performance Standard (NSPS) Subpart Da, Compliance Assurance Monitoring, Consent Decree, and A.A.C. R18-2-306.A.3.c. Each of these requirements specify timeframes for the reporting of deviations associated with downtime for the applicable monitoring system in the permit. Therefore, the inclusion of these conditions as permit requirements subject to prompt permit deviation reporting is inconsistent with the language of A.A.C. R18-2-306.A.5.b. The permit conditions identified and the reporting timeframe specified by the applicable requirement are detailed in the table below:

Table 1: Conditions Removed from Prompt Reporting of Deviations

Permit Condition	Permit Language	Applicable Requirement	Reporting Frequency
II.K.3.a of Att. "B"	The Permittee shall operate and maintain Units 1 and 2, including associated air pollution control and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.	NESHAP Subpart UUUUU	Quarterly
II.K.7.b(3) of Att. "B"	During startup and shutdown, the Permittee shall operate all CMS, collect data, calculate pollutant emission rates, and record data. The Permittee may use diluent cap and default gross output values as described in Condition II.K.7.a(7).		
II.K.7.a(2) of Att. "B"	If the Permittee uses CEMS to determine compliance with a 30-boiler operating day rolling average emission limit, the Permittee shall collect quality-assured CEMS data for all unit operating conditions, including startup and shutdown (see Table 3 to 40 CFR 63 Subpart UUUUU), except as otherwise provided in Condition II.K.7.b(4). Emission rates determined during startup periods and shutdown periods (as defined in Condition II.K.2) are not to be included in the compliance determinations, except as otherwise provided in 40 CFR 63.10000(c)(1)(vi)(B) and 40 CFR 63.10005(a)(2)(iii).		
II.K.7.b(4) of Att. "B"	The Permittee shall operate the monitoring systems and collect data at all required intervals at all times that the affected EGU is operating, except for required monitoring system quality assurance or quality control activities, including, as applicable, calibration checks and required zero and span adjustments, and any scheduled maintenance as defined in the site-specific monitoring plan. The Permittee shall affect monitoring system repairs in response to monitoring system malfunctions and to return the monitoring system to operation as expeditiously as practicable		
II.K.7.a(3)(a) of Att. "B"	Install, certify, operate, and maintain the PM CEMS using Performance Specification 11 at Appendix B to 40 CFR Part 60 and Procedure 2 at Appendix F to 40 CFR Part 60.		
II.K.7.a(3)(b) of Att. "B"	Install, certify, operate and maintain SO ₂ CEMS using 40 CFR Part 75 and 40 CFR 63.10010(a) and (f).		
II.K.7.a(3)(c) of Att. "B"	Install, certify, operate and maintain Hg CEMS or sorbent trap monitoring systems using Sections 3.2.1 and 5.1 or Sections 3.2.2 and 5.2, respectively, of Appendix A of 40 CFR Part 63, Subpart UUUUU.		

II.K.7.a(3)(d) of Att. "B"	Install, certify, operate and maintain the diluent gas, flow rate, and/or moisture monitoring systems using 40 CFR Part 75 and 40 CFR 63.10010(a), (b), (c) and (d).		
II.K.7.a(4) of Att. "B"	If the Permittee uses an oxygen (O ₂) or carbon dioxide (CO ₂) CEMS to convert measured pollutant concentrations to the units of the applicable emissions limit, the O ₂ or CO ₂ concentrations shall be monitored at a location that represents emissions to the atmosphere, i.e., at the outlet of the EGU, downstream of all emission control devices. The Permittee shall install, certify, maintain, and operate the CEMS according to 40 CFR Part 75. The Permittee shall use only quality assured O ₂ or CO ₂ data in the emissions calculations and shall not use 40 CFR Part 75 substitute data values.		
II.K.7.a(5) of Att. "B"	If the Permittee is required to use a stack gas flow rate monitor to convert pollutant concentrations to units of an electrical output-based emission standard in Condition II.K.6, it shall be installed, certified, operated, maintained, and quality-assured according to 40 CFR Part 75. The Permittee shall use only unadjusted, quality-assured flow rate data in the emissions calculations, and shall not apply bias adjustment factors to the flow rate data or use substitute flow rate data in the calculations.		
II.K.7.a(6) of Att. "B"	If the Permittee is required to make corrections for stack gas moisture content when converting pollutant concentrations to the units of an emission standard in Condition II.K.6, the Permittee shall install, certify, operate, and maintain a moisture monitoring system in accordance with 40 CFR Part 75. Alternatively, for coal-fired units, the Permittee may use appropriate fuel-specific default moisture values from 40 CFR 75.11(b) to estimate the moisture content of the stack gas or the Permittee may petition the Administrator under 40 CFR 75.66 of this chapter for use of a default moisture value for non-coal-fired units. If the Permittee installs and operates a moisture monitoring system, the Permittee shall not use substitute moisture data in the emissions calculations.		
II.K.7.b(7)(a), (b), and (d) of Att. "B"	The Permittee shall collect, record, report, and maintain data obtained during periods of startup or shutdown from the monitoring systems necessary for demonstrating compliance with the work practice standards for PM.		

	<p>The Permittee shall operate, maintain, and quality-assure the data from the PM CEMS according to Section 5 of Appendix C to 40 CFR 63 Subpart UUUUU.</p>		
	<p>The Permittee shall collect data using the PM CEMS at all times Units 1 and 2 are operating and at the intervals specified in 40 CFR 63.10010(a), except for required monitoring system quality assurance or quality control activities and any scheduled maintenance as defined in the site-specific monitoring plan.</p>		
II.K.7.b(6)(a) and (b) of Att. "B"	<p>For demonstrating continuous compliance with the SO₂ emissions limits of Condition II.K.6.a(2), the Permittee shall certify, operate, and maintain the SO₂ CEMS according to 40 CFR Part 75</p>		
	<p>For on-going QA, the SO₂ CEMS shall meet the applicable daily, quarterly, and semiannual or annual requirements in Sections 2.1 through 2.3 of Appendix B to 40 CFR Part 75, with the following addition: The Permittee shall perform the linearity checks required in Section 2.2 of Appendix B to 40 CFR Part 75 if the SO₂ CEMS has a span value of 30 ppm or less</p>		
II.K.7.b(8)(a) of Att. "B"	<p>The Permittee shall operate, maintain, and quality-assure the data from the CEMS or sorbent trap monitoring systems in accordance with Appendix A of 40 CFR Part 63 Subpart UUUUU.</p>		
II.K.3.b(4), (5), and (6) of Att. "B"	<p>Once a unit is converted to firing coal, the Permittee shall engage all of the applicable control technologies except SCR.</p>		
	<p>The Permittee shall start the SCR systems, if present, appropriately to comply with relevant standards applicable during normal operation.</p>		
	<p>During shutdown, the Permittee shall operate all applicable control technologies while firing coal.</p>		
II.D.3.g of Att "B"	<p>The Permittee shall calibrate, maintain, and operate continuous opacity monitoring system (COMS) for measuring the opacity of emissions.</p>		
II.E.3.a of Att. "B"	<p>The Permittee shall calibrate, maintain, and operate a continuous emissions monitoring system for measuring nitrogen oxides emissions.</p>	NSPS Subpart Da	Semiannual
II.G.3.a of Att. "B"	<p>The Permittee shall calibrate, maintain, and operate continuous emissions monitoring system (CEMS) for measuring sulfur dioxide emissions.</p>		

II.D.3.i(2) and (3) of Att. "B"	The Permittee shall maintain the monitoring equipment, including but not limited to maintaining necessary parts for routine repair of the monitoring equipment.	Compliance Assurance Monitoring	Semiannual
	Except for, as applicable, monitoring equipment malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the boilers are operating. Data recorded during monitoring equipment malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The Permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring equipment malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring equipment to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.		
II.D.3.e of Att. "B"	The Permittee shall maintain, correlate, and operate a continuous emission monitoring system for measuring PM emissions on Unit 1 and Unit 2.	Consent Decree	Semiannual
II.H.2.a of Att. "B"	The Permittee shall calibrate, maintain, and operate continuous emission monitoring systems (CEMS) for measuring emissions of CO.	A.A.C. R18-2-306.A.3.c	Semiannual

SRP also proposes to further streamline the prompt permit deviation reporting requirements for Conditions II.F.1.a, II.F.2.a, and II.G.1 of Attachment "E" by removing Conditions II.F.1.a and II.F.2.a from the conditions identified in Condition I.E.1 of Attachment "B" due to the overlap in requirements and authority. The permit conditions are outlined below:

Table 2: Streamlined Prompt Deviation Reporting Conditions

Permit Condition	Permit Language
II.F.1.a of Att. "E"	At all times, the Permittee shall calibrate, maintain, and operate a continuous emissions monitoring system for monitoring NO _x emissions in accordance with 40 CFR Part 75 requirements.
II.F.2.a of Att. "E"	At all times, the Permittee shall calibrate, maintain, and operate a continuous emissions monitoring system for monitoring SO ₂ emissions in accordance with 40 CFR Part 75 requirements.

II.G.I of Att. "E"	At all times, the Permittee shall calibrate, maintain, and operate CEMS, in full compliance with the requirements of 40 CFR Part 75, to accurately measure SO ₂ , NO _x , diluent, and stack gas volumetric flow rate from each unit.
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This SPR also further clarifies reporting requirements under NESHAP Subpart UUUUU following to the applicable compliance reporting frequency being revised to quarterly reporting beginning January 1, 2024.

III. PREVIOUS PERMIT CONDITIONS

Table 3 addresses the changes made to the sections and conditions from Permit No. 89460:

Table 3: Previous Permit Conditions

Section No.	Determination			Comments
	Added	Revised	Deleted	
Att. "B" Condition I.E		X		Facility-Wide Requirements: Revised conditions subject to prompt reporting of permit deviations in accordance with Condition XI.B.2 of Attachment "A."
Att. "B" Section II.K		X		Mercury and Air Toxics (MATS) – 40 CFR 63 Subpart UUUUU: Revised to further clarify changes in reporting frequency.

IV. LIST OF ABBREVIATIONS

A.A.C.....	Arizona Administrative Code
ADEQ.....	Arizona Department of Environmental Quality
CEMS.....	Continuous Emissions Monitoring System
CFR.....	Code of Federal Regulations
CMS.....	Continuous Monitoring System
CO.....	Carbon Monoxide
CO ₂	Carbon Dioxide
COMS.....	Continuous Opacity Monitoring Systems
Hg.....	Mercury
NESHAP.....	National Emission Standard for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS.....	New Source Performance Standards
PM.....	Particulate Matter
O ₂	Oxygen
SCR.....	Selective Catalytic Reduction
SO ₂	Sulfur Dioxide
SRP.....	Salt River Project