



United States Department of the Interior

NATIONAL PARK SERVICE

Air Resources Division

P.O. Box 25287

Denver, CO 80225-0287

IN REPLY REFER TO:

N3615 (2350)

July 24, 2013

Ms. Rita Bates
Planning Section Chief, Air Quality Bureau
New Mexico Environment Department
525 Camino de los Marquez, Suite 1
Santa Fe, NM 87505

Dear Rita:

Thank you for the opportunity to review and comment on the proposed State Alternative for Best Available Retrofit Technology for nitrogen oxide (NO_x) emissions from San Juan Generating Station (SJGS). The State Alternative was developed through negotiation between New Mexico Environment Department (NMED), Public Service of New Mexico (PNM), and the Environmental Protection Agency (EPA) Region 6, after EPA disapproved New Mexico's BART determination for SJGS and proposed a Federal Implementation Plan (FIP) with more stringent controls.

PNM did not demonstrate that the State Alternative (Selective Non-Catalytic Reduction (SNCR) on two units and shut down of two units) is better than EPA's proposed BART determination (Selective Catalytic Reduction (SCR) on four units). PNM did not follow the BART guidelines to model maximum 24-hour emissions, so model results do not accurately estimate the visibility impacts. Actual 24-hour maximum NO_x emissions should have been used for the baseline, and compared to the percentage emissions reductions for each control technology (23% for SNCR and 83% for SCR).

The State Alternative needs to demonstrate greater visibility improvement than the EPA FIP proposal. We recommend that PNM and NMED evaluate the feasibility of further lowering the emissions limits for NO_x and/or SO₂ to demonstrate that the State Alternative is better than the EPA FIP proposal.

We also note that PNM overestimated the costs of SCR. We recalculated costs consistent with the BART guidelines and found that SCR costs are in the same range as accepted by other states as BART. Our detailed comments are enclosed.

We appreciate the opportunity to work closely with NMED to improve visibility at Class I national park units. If you have questions, please contact Don Shepherd at 303-969-2153 or don_shepherd@nps.gov.

Sincerely,

Susan Johnson
Chief, Policy, Planning, and Permit Review Branch

Enclosure

cc:
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bcc:

ARD-WASO: Julie Thomas McNamee

ARD-DEN: Johnson, McCoy, Vimont, Permit Review Group, Reading and Project File

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