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Subject: Follow-up Regarding Enterprise Submittal of Four-Factor Analysis of Control Measures for South Carlsbad Compressor Station Turbines

Dear Ms. Miro:

The New Mexico Environment Department (NMED) Air Quality Bureau (AQB) has completed its preliminary review of the South Carlsbad Compressor Station four-factor reasonable progress analysis you submitted to NMED, per our July 18, 2019 request. The four-factor analysis was received on October 31, 2019. Pursuant to [NMED's Regional Haze Guiding Principles](#), the four-factor analysis must consider new ideas that potentially offer better solutions to problems and must evaluate the newest engineering methods and technology advances in potential control measures.

NMED has the following questions regarding the emissions control options you presented for the two (2) Solar Centaur T4702 Combustion Turbines.

1. Selective Catalytic Reduction (SCR) Technology

- a. You rejected consideration of SCR technology on account of space considerations; please provide more details on the specific dimensions and space required for the installation of SCR technology.
- b. Please also provide an estimated NO_x control efficiency.

2. Cost Effectiveness

- a. Please provide a vendor quote from Solar Turbines for the SoLoNO_x packages.

3. Emissions Data

- a. Adjacent to the turbine NO_x emissions lb./hr. and ton/year (tpy) data in your 4-Factor analysis for SoLoNO_x implementation is the statement, “from 2016 stack test data”. Your 2016 Emissions Inventory submittal, however, does not match the data presented in your analysis (**Unit 1:** 7.59 lb./hr., 32.42 tpy; **Unit 2:** 9.55 lb./hr., 40.80 tpy). Further observation of your 2016-2018 Emissions Inventory submittals shows numerous stack test results for the years 2014-2018, none of which matches the lb./hr. values you used in the analysis. Please clarify.

4. Other Control Options

- a. Have you considered other options not otherwise listed in your 4-Factor Analysis?
 - i. Staged Combustion;
 - ii. Ultra-Lean Combustion;
 - iii. Water-Steam Injection; and
 - iv. Post-Combustion other than SCR (e.g., XONON, SCONO_x, NSCR).

Please note that per EPA’s Guidance on Regional Haze State Implementation Plans for the Second Implementation Period (August 20, 2019), “as part of meeting the requirement of the Regional Haze Rule for the state to document the cost and engineering information on which the State is relying every source-specific cost estimate used to support an analysis of control measure must be documented in the SIP”. If you feel that your supplemental information should be classified as confidential business information (CBI), it will need to be reviewed and approved as such by NMED and EPA. Submit CBI with the word ‘confidential’ included in the electronic file name and on each page of the document. Do not combine non-confidential business information and CBI in the same files. Also, the claimant must satisfy the conditions in 20.2.1.115.B(3)(a)-(d) NMAC when the CBI is submitted. Until NMED and EPA determines if the information qualifies as CBI, the information will not be disclosed to anyone other than those listed in 20.2.1.115 NMAC.

NMED respectfully requests that your company submit the additional information on four-factor analysis electronically as soon as possible to Mark Jones at mark.jones@state.nm.us and myself at kerwin.singleton@state.nm.us. Please contact NMED if you have questions about the additional information request. We encourage your questions in order to help expedite the technical analysis required under the Regional Haze Program. Staff would be happy to meet with you in person to discuss these requirements in more detail. Likewise, staff may further contact you with questions or require additional information during its review of your submittals.

Thank you for your assistance in this matter. If you have questions or need clarification, please contact me at (505) 476-4350, or Mark Jones at (505) 566-9746.

Sincerely,

Kerwin C. Singleton
Planning Section Chief

xc: Jake Zenker, Trinity Consultants, jzenker@trinityconsultants.com