

Bryan W. Shaw, Ph.D., *Chairman*
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Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

July 29, 2010

MR CARL E EDLUND PE
DIRECTOR MULTIMEDIA PLANNING AND PERMITTING DIVISION
US ENVIRONMENTAL PROTECTION AGENCY REGION 6
1445 ROSS AVE STE 1200
DALLAS TX 75202-5766

Re: Executive Director's Response to EPA Comments
Significant Revision
Permit Number: O15
Southwestern Public Service Company
Harrington Station Power Plant
Amarillo, Potter County
Regulated Entity Number: RN100224849
Customer Reference Number: CN601481336

Dear Mr. Edlund:

On December 11, 2009, the U.S. Environmental Protection Agency (EPA) Region 6 Office signed a letter identifying objections to the issuance of the proposed federal operating permit for the above-referenced site. In accordance with Title 30 Texas Administrative Code § 122.350 (30 TAC § 122.350), the Texas Commission on Environmental Quality (TCEQ) may not issue the permit until the objections are resolved.

The TCEQ responded to EPA's objections on March 9, 2010. Southwestern Public Service Company re-published notice on May 6, 2010. On July 2, 2010, TCEQ received additional comments from EPA. In response to the additional comments and in agreement with EPA during a teleconference on July 20, 2010, Appendix B has been revised in the proposed permit. The revised proposed permit and statement of basis are attached for your review along with TCEQ's individual responses to your July 2, 2010 additional comments.

Mr. Carl E. Edlund, P.E.
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Consistent with 30 TAC §122.350, please provide an indication of your acceptance or assessment of the responses and resolutions to the objections as soon as possible. After receipt of your acceptance to the responses and resolutions to the December 11, 2009 objections and July 2, 2010 comments, TCEQ will issue the proposed permit. Thank you for your cooperation in this matter. Please contact Ms. Camilla Widenhofer at (512) 239-1028 if you have any questions concerning this matter.

Sincerely,



Steve Hagle, P.E., Director
Air Permits Division
Office of Permitting and Registration
Texas Commission on Environmental Quality

SH/CW/dw

cc: Mr. Kevin L. Worley, Environmental Coordinator, Southwestern Public Service Company,
Amarillo
Mr. Ron Dutton, Manager, Air and Water Compliance, Southwestern Public Service
Company, Amarillo
Air Section Manager, Region 1 - Amarillo

Enclosures: Proposed Permit
Statement of Basis
Executive Director's Responses to July 2, 2010 EPA Comment Letter

Project Number: 13253

Executive Director's Responses to July 2, 2010 EPA Comment Letter
Permit Number O15
Southwestern Public Service Company
Harrington Station Power Plant

EPA Comment:

1. On June 10, 2010, the company submitted the *Federally Enforceable Unit Specific Emission Limitations for Individual Emission Units* table for inclusion into the Title V permit. We understand that the table was prepared in an effort to resolve an objection in our December 11, 2009, objection letter and TCEQ has agreed to its inclusion into the Title V permit. We have concerns with the content of the table itself. After reviewing the table, we request that the permit record (as well as the table itself) be clarified to include the appropriate basis for the unit specific emission rates for NO_x and SO (lb/MMBtu) stated in the *Federally Enforceable Unit Specific Emission Limitations for Individual Emission Units* table. We note the table indicates the emission rates referenced are in effect and are based on 40 CFR § 60.45(b)(3) and 40 CFR Part 75. However, we are interested in whether Prevention of Significant Deterioration (PSD) was ever triggered for these units resulting in requirements for federal best available control technology (BACT) being implemented. Has an applicable BACT emission rate been established for NO_x and SO₂ for Emission Point Numbers HS-1, 2-1, and 3-1? It is important that the most stringent applicable emission rate (i.e., New Source Performance Standards or BACT) be applied to Emission Point Numbers HS-1, 2-1, and 3-1. We also note that the Preliminary Determination Summaries (PDS) for both PSD permits that were prepared in 2008 (PSDTX017M1 for Units 2 and 3) and 2009 (PSDTX631M1 for C) referenced NO_x emission rates of 0.225 lb/MMBtu and 0.25 lb/MMBtu, respectively; the table lists the emission rates for NO_x for all three units as ranging from 0.2 - 0.7 lb/MMBtu (3-hr. rolling avg.), dependent on the fuel, and 0.4 lb/MMBtu (annual avg.) and creates uncertainty as to the correct emission limitations. The table lists the emission rate for SO₂ for all three units as 1.2 lbs/MMBtu (3-hr. rolling avg.). Please explain the discrepancies to EPA and provide the prevailing emission limitations in the *Federally Enforceable Unit Specific Emission Limitations for Individual Emission Units* table.

Response:

The NO_x lb/MMBtu annual limits as represented in the Title V permit have been added to the *Federally Enforceable Unit Specific Emission Limitations for Individual Emission Units* table, as requested. In addition to the Harrington Units 1 and 2 limits listed in the comment letter, the emission limit for Unit 3 has been added as well. BACT analyses, when required, were performed for each of these units at the time of permitting or permit modification as required by the regulations applicable at the time as follows: Construction permits C1388, 3080, and 5129 were issued by EPA on August 28, 1973 for Unit 1, on January 8, 1976 for Unit 2, and on July 27, 1977 for Unit 3, respectively. Permits C1388 and 3080 for Unit 1 and Unit 2 were not initially PSD projects since PSD did not exist at that time. On March 28, 1984, EPA issued PSDTX631 for removal of a scrubber on Unit 1, which resulted in a BACT requirement for SO₂ and triggered PSD for SO₂. PSD is pollutant specific and did not apply to NO_x at that time. On January 15, 2010, PSDTX631M1 was issued for the addition of a low-NO_x burner which

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triggered PSD for CO. NO_x decreased and so was not affected by PSD. On October 2, 2008, PSDTX017M2 was issued when Unit 2 was rolled into PSDTX017M1 for the addition of a low-NO_x burner for Unit 2 which triggered PSD for CO. NO_x decreased and so was not affected by PSD. On July 27, 1977, PSDTX017 was issued by EPA for Unit 3 which was subject to PSD for SO₂. EPA did not require BACT for NO_x at that time.

EPA Comment:

2. Permit Condition 7 – In accordance with 40 CFR § 70.6(a)(1)(i), if special conditions are granted, permit conditions must define and provide regulatory citations referencing proper authority allowing TCEQ to grant the special exemptions. EPA was unable to discern from the Table whether any had been granted for this facility. Please explain to EPA whether any special exemptions have been granted and the regulatory basis of those exemptions.

Response:

The only special exemption that has been issued for Harrington Station is number X-16383, which was for a coal-slurry pilot project in 1985. The project has not existed for some time and could not be restarted without significant work, which would require re-permitting. To clarify the authorizations applicable at the site, Southwestern Public Service Company submitted a letter dated July 26, 2010 requesting that the permit exemption be removed from the account. The special exemption has been voided as of July 27, 2010 and FOP No. O15 has been updated to no longer reflect NSR Permit X-16383.

EPA Comment:

3. According to a PDS for an amendment to NSR Permit No. 3080 and PSDTX017M1, the draft Title V permit contains a Pollution Control Project (PCP). The PSD permit states in Section III, Paragraph 2, "The current pollution control project amendment is for low NO_x modification..." Paragraph 3 of Section III then states, "NSR Permit Number 3080 will be amended and concurrently rolled into NSR Permit 5129 and PSDTX017M1, the latter of which will be modified to become PSDTX017M2". It is therefore assumed that the PCP was incorporated into NSR Permit 5129, although the TCEQ New Source Review Air Permits Database does not currently reflect this. The PCP amendment would be authorized under the provisions of 30 TAC 116.617. TCEQ's creation of a PCP Standard Permit that can be used by sources may not fit within the scope or intent of our original approval of TCEQ's standard permit program (see 68 Fed. Reg. 64548, November 14, 2003). Specifically Southwestern Public Service Company should provide an analysis of major PSD, Non-attainment New Source Review (NNSR) applicability, or a minor New Source Review (NSR) case-by-case review for the proposed activities. TCEQ must then make a determination on these analyses and notify EPA of their findings.

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Response:

Harrington Station has never applied for a Pollution Control Project (PCP) using the PCP standard permit as allowed under 30 TAC Chapter 116, Subchapter F. The low-NO_x pollution control project for NSR Permit No. 3080 was conducted on the basis of a NSR case-by-case major modification in compliance with the guidelines promulgated under 40 CFR Part 51.20, pursuant to 30 TAC § 116.160(d). The option to use the standard permit under the provisions of 30 TAC § 116.617 was not considered nor exercised. NSR Permit 3080 was rolled into NSR Permit 5129 for administrative and cost reasons. However, the low-NO_x project resulted in an increase in CO emissions that triggered PSD review. Therefore the modification of PSDTX017M1 to PSDTX017M2 was issued with the amendment of NSR Permit 5129 on October 2, 2008.

EPA Comment:

4. The draft permit incorporates individual NSR Permit Number 16383 and Permits by Rule (PBR) Permit Numbers 106.102, 106.227, 106.262, 106.454, 106.472, 106.511, 014, 051, 053, 070, 008, and 084. Please note our letter dated June 10, 2010. We have significant concerns related to the adequacy of permitting associated with TCEQ's use of incorporation by reference for Minor New Source Review permits and PBRs. Particular issues of concern include, but are not limited to, PBRs that purport to modify Major NSR emission limits and that lead to the controlling limit not being reflected in the body of the Title V permit, failure of the TCEQ to make the currently applicable Minor NSR permits and PBRs readily available to the public, and the practical inability of EPA and the public to determine the applicable emission limitations and standards for each particular emission unit.

Response:

The attached table, *Sources Covered by Permit by Rule (PBR)*, lists the PBRs that are used at the facility, along with the associated emission sources. The only PBR that affects the three electric generating units is 30 TAC § 106.261, which allows for the burning of a small amount of wood (500 tons) and the burning/disposal of contraband substances by local law enforcement agencies. The burning of wood as listed in the PBR potentially increases NO_x by 0.124 tpy, CO by 1.761 tpy, and VOC by 0.028 tpy. SO₂ would potentially decrease by 3.630 tpy. The burning of contraband substances resulted in a total potential increase of 0.007 tpy of emissions. The emission limits are for all three units combined. The material can be disposed in any or all of the units. The increases would not trigger major NSR review.

Federally Enforceable Unit Specific Emission Limitations For Individual Emission Units
Harrington Station
Southwestern Public Service Company
Amarillo, Texas

Emission Point Number	Permit No.	Pollutant	Limit	Units	Special Averaging Time	Operating Scenario (if any)	Limitation Reference	BACT-Based Limit?	Monitoring	Recordkeeping	Reporting	Other Related Special Condition(s)
HS-1	NSR 1388 / PSDTX631M1	NO _x	2,504 *	lb/hr	—	—	Permit MAERT ***	Y	Permit SC 8	Permit SC 13 Permit SC 14	Permit SC 8.E Permit SC 8.F	—
HS-1	NSR 1388 / PSDTX631M1	NO _x	8,744 *	ton/yr	12-month rolling avg	—	Permit MAERT	Y	Permit SC 8	Permit SC 13 Permit SC 14	Permit SC 8.E Permit SC 8.F	—
HS-1	NSR 1388 / PSDTX631M1	NO _x	1,452 **	lb/hr	—	—	Permit MAERT		Permit SC 8	Permit SC 13 Permit SC 14	Permit SC 8.E Permit SC 8.F	—
HS-1	NSR 1388 / PSDTX631M1	NO _x	3,975 **	ton/yr	12-month rolling avg	—	Permit MAERT		Permit SC 8	Permit SC 13 Permit SC 14	Permit SC 8.E Permit SC 8.F	—
HS-1	NSR 1388 / PSDTX631M1	CO	429 *	lb/hr	—	—	Permit MAERT		Permit SC 11	Permit SC 13	Permit SC 11	—
HS-1	NSR 1388 / PSDTX631M1	CO	1,881 *	ton/yr	12-month rolling avg	—	Permit MAERT		Permit SC 12	Permit SC 13	Permit SC 12	—
HS-1	NSR 1388 / PSDTX631M1	CO	1,634 **	lb/hr	—	—	Permit MAERT	Y	Permit SC 11	Permit SC 13	Permit SC 11	—
HS-1	NSR 1388 / PSDTX631M1	CO	5,247 **	ton/yr	12-month rolling avg	—	Permit MAERT	Y	Permit SC 12	Permit SC 13	Permit SC 12	—
HS-1	NSR 1388 / PSDTX631M1	CO	0.33 **	lb/mmBtu	30 day rolling avg.	—	Permit SC 4	Y	Permit SC 13	Permit SC 13	Permit SC 13	—
HS-1	NSR 1388 / PSDTX631M1	SO ₂	4,293	lb/hr	—	—	Permit MAERT	Y	Permit SC 10	Permit SC 13 Permit SC 14	40 CFR Part 75	Permit SC 2 - Fuel Limitations
HS-1	NSR 1388 / PSDTX631M1	SO ₂	15,080	ton/yr	12-month rolling avg	—	Permit MAERT	Y	Permit SC 11	Permit SC 13 Permit SC 14	40 CFR Part 75	—
HS-1	NSR 1388 / PSDTX631M1	PM/PM ₁₀	359	lb/hr	—	—	Permit MAERT	Y	Permit SC 9 ****	Permit SC 13	Permit SC 9 ****	—
HS-1	NSR 1388 / PSDTX631M1	PM/PM ₁₀	1257	lb/mmBtu	—	—	Permit MAERT	Y	Permit SC 9 ****	Permit SC 13	Permit SC 9 ****	—
HS-1	NSR 1388 / PSDTX631M1	Opacity	20/27	percent	6 min. avg.	—	Permit SC 1	Y	Permit SC 9	Permit SC 14	Permit SC 9	—
HS-1	NSR 1388 / PSDTX631M1	VOC	13.31	lb/hr	—	—	Permit MAERT		—	Permit SC 13	—	—
HS-1	NSR 1388 / PSDTX631M1	VOC	58.32	ton/yr	12-month rolling avg	—	Permit MAERT		—	Permit SC 13	—	—
HS-1	NSR 1388 / PSDTX631M1	F (as HF)	19	lb/hr	—	—	Permit MAERT	Y	****	Permit SC 13	****	—
HS-1	NSR 1388 / PSDTX631M1	F (as HF)	67.8	ton/yr	12-month rolling avg	—	Permit MAERT	Y	****	Permit SC 13	****	—
HS-1	NSR 1388 / PSDTX631M1	Be	0.0111	lb/hr	—	—	Permit MAERT	Y	****	Permit SC 13	****	—
HS-1	NSR 1388 / PSDTX631M1	Be	0.04	ton/yr	12-month rolling avg	—	Permit MAERT	Y	****	Permit SC 13	****	—
HS-1	NSR 1388 / PSDTX631M1	HCl	10.41	lb/hr	—	—	Permit MAERT		—	Permit SC 13	—	—
HS-1	NSR 1388 / PSDTX631M1	HCl	45.6	ton/yr	12-month rolling avg	—	Permit MAERT		—	Permit SC 13	—	—
HS-1	NSR 1388 / PSDTX631M1	NO _x	0.7	lb/mmBtu	3 hr. rolling avg.	Coal/Wood	40 CFR 60.44(a)(3)	Y	40 CFR 60.45(b)(3)	40 CFR 60.7	40 CFR 60.45(g)	—
HS-1	NSR 1388 / PSDTX631M1	NO _x	0.2	lb/mmBtu	3 hr. rolling avg.	Gaseous Fuel	40 CFR 60.44(a)(1)		40 CFR 60.45(b)(3)	40 CFR 60.7	40 CFR 60.45(g)	—
HS-1	NSR 1388 / PSDTX631M1	NO _x	0.4	lb/mmBtu	annual	—	40 CFR 76.7(a)(1)		40 CFR 75	40 CFR 75	40 CFR 75	—
HS-1	NSR 1388 / PSDTX631M1	NO _x	0.25	lb/mmBtu	annual	—	Application Representation		—	—	—	—

Federally Enforceable Unit Specific Emission Limitations For Individual Emission Units
 Harrington Station
 Southwestern Public Service Company
 Amarillo, Texas

Emission Point Number	Permit No.	Pollutant	Limit	Units	Special Averaging Time	Operating Scenario (if any)	Limitation Reference	BACT-Based Limit?	Monitoring	Recordkeeping	Reporting	Other Related Special Condition(s)
HS-1	NSR 1388 / PSDTX631M1	SO ₂	1.2	lb/mmBtu	3 hr. rolling avg.	Coal/Wood	40 CFR 60.43(a)(2)		40 CFR 60.45(b)(2)	40 CFR 60.7	40 CFR 60.45(g)	—
HS-1	NSR 1388 / PSDTX631M1	TSP	0.1	lb/mmBtu	—	—	40 CFR 60.42(a)(1)		****	Permit SC 13	****	—
HS-1	NSR 1388 / PSDTX631M1	Opacity	20/27	percent	6 min. avg.	—	40 CFR 60.42(a)(2)		40 CFR 60.45(a)	40 CFR 60.7	40 CFR 60.45(g)	—
HS-2	NSR 1388 / PSDTX631M1	PM ₁₀	0.38	lb/hr	—	—	Permit MAERT		Permit SC 5	Permit SC 13	—	—
HS-2	NSR 1388 / PSDTX631M1	PM ₁₀	1.5	ton/yr	12-month rolling avg	—	Permit MAERT		Permit SC 5	Permit SC 13	—	—
2-1	NSR 5129 / PSDTX017M2	NO _x	1,341	lb/hr	—	—	Permit MAERT		Permit SC 7	Permit SC 7, 9, and 10	Permit SC 7	—
2-1	NSR 5129 / PSDTX017M2	NO _x	3,774	ton/yr	12-month rolling avg	—	Permit MAERT		Permit SC 7	Permit SC 7, 9, and 10	Permit SC 7	—
2-1	NSR 5129 / PSDTX017M2	CO	1,915	lb/hr	—	—	Permit MAERT	Y	Permit SC 8	Permit SC 7 and 9	Permit SC 7	—
2-1	NSR 5129 / PSDTX017M2	CO	5,033	ton/yr	12-month rolling avg	—	Permit MAERT	Y	Permit SC 8	Permit SC 7 and 9	Permit SC 7	—
2-1	NSR 5129 / PSDTX017M2	PM ₁₀	383	lb/hr	—	—	Permit MAERT		Permit SC 9	Permit SC 9	Permit SC 9	—
2-1	NSR 5129 / PSDTX017M2	PM ₁₀	1,579	ton/yr	12-month rolling avg	—	Permit MAERT		Permit SC 9	Permit SC 9	Permit SC 9	—
2-1	NSR 5129 / PSDTX017M2	Opacity	20/27	percent	6 min. avg.	—	Permit SC 1		Permit SC 7, 9, and 10	Permit SC 7, 9, and 10	Permit SC 7	—
2-1	NSR 5129 / PSDTX017M2	VOC	14	lb/hr	—	—	Permit MAERT		—	Permit SC 9	—	—
2-1	NSR 5129 / PSDTX017M2	VOC	56	ton/yr	12-month rolling avg	—	Permit MAERT		—	Permit SC 9	—	—
2-1	NSR 5129 / PSDTX017M2	SO ₂	4,602	lb/hr	—	—	Permit MAERT		Permit SC 7	Permit SC 7	Permit SC 7	Permit SC 3 - Fuel Limitations
2-1	NSR 5129 / PSDTX017M2	SO ₂	18,946	ton/yr	12-month rolling avg	—	Permit MAERT		Permit SC 7	Permit SC 7	Permit SC 7	—
2-1	NSR 5129 / PSDTX017M2	NO _x	0.7	lb/mmBtu	3 hr. rolling avg.	Coal/Wood	40 CFR 60.44(a)(3)		40 CFR 60.45(b)(3)	40 CFR 60.7	40 CFR 60.45(g)	—
2-1	NSR 5129 / PSDTX017M2	NO _x	0.2	lb/mmBtu	3 hr. rolling avg.	Gaseous Fuel	40 CFR 60.44(a)(1)		40 CFR 60.45(b)(3)	40 CFR 60.7	40 CFR 60.45(g)	—
2-1	NSR 5129 / PSDTX017M2	NO _x	0.4	lb/mmBtu	annual	—	40 CFR 76.7(a)(1)		40 CFR 75	40 CFR 75	40 CFR 75	—
2-1	NSR 5129 / PSDTX017M2	NO _x	0.225	lb/mmBtu	annual	—	Application Representation		—	—	—	—

Federally Enforceable Unit Specific Emission Limitations For Individual Emission Units
Harrington Station
Southwestern Public Service Company
Amarillo, Texas

Emission Point Number	Permit No.	Pollutant	Limit	Units	Special Averaging Time	Operating Scenario (if any)	Limitation Reference	BACT-Based Limit?	Monitoring	Recordkeeping	Reporting	Other Related Special Condition(s)
2-1	NSR 5129 / PSDTX017M2	SO ₂	1.2	lb/mmBtu	3 hr. rolling avg.	Coal/Wood	40 CFR 60.43(a)(2)		40 CFR 60.45(b)(2)	40 CFR 60.7	40 CFR 60.45(g)	—
2-1	NSR 5129 / PSDTX017M2	TSP	0.1	lb/mmBtu	—	—	40 CFR 60.42(a)(1)		Permit SC 9 ****	Permit SC 9	Permit SC 9 ****	—
2-1	NSR 5129 / PSDTX017M2	Opacity	20/27	percent	6 min. avg.	—	40 CFR 60.42(a)(2)		40 CFR 60.45(a)	40 CFR 60.7	40 CFR 60.45(g)	—
2-2	NSR 5129 / PSDTX017M2	PM ₁₀	0.5	lb/hr	—	—	Permit MAERT		Permit SC 9	Permit SC 9	—	Permit SC 5 - Work Practices
2-2	NSR 5129 / PSDTX017M2	PM ₁₀	2.2	ton/yr	12-month rolling avg	—	Permit MAERT		Permit SC 9	Permit SC 9	—	Permit SC 5 - Work Practices
2-2A	NSR 5129 / PSDTX017M2	PM ₁₀	0.046	lb/hr	—	—	Permit MAERT		Permit SC 9	Permit SC 9	—	Permit SC 5 - Work Practices
2-2A	NSR 5129 / PSDTX017M2	PM ₁₀	0.2	ton/yr	12-month rolling avg	—	Permit MAERT		Permit SC 9	Permit SC 9	—	Permit SC 5 - Work Practices
2-2B	NSR 5129 / PSDTX017M2	PM ₁₀	0.046	lb/hr	—	—	Permit MAERT		Permit SC 9	Permit SC 9	—	Permit SC 5 - Work Practices
2-2B	NSR 5129 / PSDTX017M2	PM ₁₀	0.2	ton/yr	12-month rolling avg	—	Permit MAERT		Permit SC 9	Permit SC 9	—	Permit SC 5 - Work Practices
3-1	NSR 5129 / PSDTX017M2	NO _x	1,161	lb/hr	—	—	Permit MAERT		Permit SC 7	Permit SC 7, 9, and 10	Permit SC 7	—
3-1	NSR 5129 / PSDTX017M2	NO _x	5,085	ton/yr	12-month rolling avg	—	Permit MAERT		Permit SC 7	Permit SC 7, 9, and 10	Permit SC 7	—
3-1	NSR 5129 / PSDTX017M2	CO	581	lb/hr	—	—	Permit MAERT		Permit SC 8	Permit SC 7 and 9	Permit SC 7	—
3-1	NSR 5129 / PSDTX017M2	CO	2,543	ton/yr	12-month rolling avg	—	Permit MAERT		Permit SC 8	Permit SC 7 and 9	Permit SC 7	—
3-1	NSR 5129 / PSDTX017M2	PM ₁₀	347	lb/hr	—	—	Permit MAERT	Y	Permit SC 9 ****	Permit SC 9	Permit SC 9 ****	—
3-1	NSR 5129 / PSDTX017M2	PM ₁₀	1,520	ton/yr	12-month rolling avg	—	Permit MAERT	Y	Permit SC 9 ****	Permit SC 9	Permit SC 9 ****	—
3-1	NSR 5129 / PSDTX017M2	TSP	0.1	lb/mmBtu	—	—	40 CFR 60.42(a)(1)	Y	Permit SC 9 ****	Permit SC 9	Permit SC 9 ****	—
3-1	NSR 5129 / PSDTX017M2	Opacity	20/27	percent	6 min. avg.	—	Permit SC 1		Permit SC 7, 9, and 10	Permit SC 7, 9, and 10	Permit SC 7	—
3-1	NSR 5129 / PSDTX017M2	VOC	55	lb/hr	—	—	Permit MAERT		—	Permit SC 9	—	—
3-1	NSR 5129 / PSDTX017M2	VOC	241	ton/yr	12-month rolling avg	—	Permit MAERT		—	Permit SC 9	—	—

Federally Enforceable Unit Specific Emission Limitations For Individual Emission Units
 Harrington Station
 Southwestern Public Service Company
 Amarillo, Texas

3-1	NSR 5129 / PSDTX017M2	SO ₂	4,151	lb/hr	—	—	Permit MAERT	Y	Permit SC 7	Permit SC 7	Permit SC 7	Permit SC 3 - Fuel Limitations
3-1	NSR 5129 / PSDTX017M2	SO ₂	18,181	ton/yr	12-month rolling avg	—	Permit MAERT	Y	Permit SC 7	Permit SC 7	Permit SC 7	—
3-1	NSR 5129 / PSDTX017M2	NO _x	0.7	lb/mmBtu	3 hr. rolling avg.	Coal/Wood	40 CFR 60.44(a)(3)		40 CFR 60.45(b)(3)	40 CFR 60.7	40 CFR 60.45(g)	—
3-1	NSR 5129 / PSDTX017M2	NO _x	0.2	lb/mmBtu	3 hr. rolling avg.	Gaseous Fuel	40 CFR 60.44(a)(1)		40 CFR 60.45(b)(3)	40 CFR 60.7	40 CFR 60.45(g)	—
3-1	NSR 5129 / PSDTX017M2	NO _x	0.4	lb/mmBtu	annual	—	40 CFR 76.7(a)(1)		40 CFR 75	40 CFR 75	40 CFR 75	—
3-1	NSR 5129 / PSDTX017M2	NO _x	0.3	lb/mmBtu	annual	—	Application Representation		—	—	—	—
3-1	NSR 5129 / PSDTX017M2	SO ₂	1.2	lb/mmBtu	3 hr. rolling avg.	Coal/Wood	40 CFR 60.43(a)(2)	Y	40 CFR 60.45(b)(2)	40 CFR 60.7	40 CFR 60.45(g)	—
3-1	NSR 5129 / PSDTX017M2	Opacity	20/27	percent	6 min. avg.	—	40 CFR 60.42(a)(2)		40 CFR 60.45(a)	40 CFR 60.7	40 CFR 60.45(g)	—
3-2	NSR 5129 / PSDTX017M2	PM ₁₀	0.34	lb/hr	—	—	Permit MAERT		Permit SC 9	Permit SC 9	—	Permit SC 5 - Work Practices
3-2	NSR 5129 / PSDTX017M2	PM ₁₀	1.5	ton/yr	12-month rolling avg	—	Permit MAERT		Permit SC 9	Permit SC 9	—	Permit SC 5 - Work Practices
3-2A	NSR 5129 / PSDTX017M2	PM ₁₀	<0.01	lb/hr	—	—	Permit MAERT		Permit SC 9	Permit SC 9	—	Permit SC 5 - Work Practices
3-2A	NSR 5129 / PSDTX017M2	PM ₁₀	<0.04	ton/yr	12-month rolling avg	—	Permit MAERT		Permit SC 9	Permit SC 9	—	Permit SC 5 - Work Practices

Notes:

* Emission limits applicable prior to completion of the pollution control project authorized on January 15, 2010

** Emission limits applicable upon completion of the pollution control project authorized on January 15, 2010

*** MAERT - Maximum Allowable Emission Rate Table

**** Performance test performed and reported at time of permit initial issue

**Total Potential Emissions of
Contraband Material**

Substance	Hourly	Annual
THC	0.20 lb	0.80 lb
CBN	0.10 lb	0.40 lb
Cocaine	0.04 lb	0.10 lb
CHM	0.04 lb	0.10 lb

EXECUTIVE DIRECTOR'S RESPONSES TO JULY 2, 2010

EPA COMMENT LETTER

Permit Number O15

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Sources Covered by Permits By Rule (PBR)

Southwestern Public Service Company
Harrington Station

PBR #	PBR Version No./Date	Unit Identification
106.511	9/4/2000	#1 Emergency Generator
106.511	9/5/2000	#2 Emergency Generator
106.511	9/6/2000	#3 Emergency Generator
106.511	9/7/2000	Fire Pump
SE 14	11/5/1986	Diesel Fuel Tank and Gasoline Fuel Tank
106.472	9/4/2000	#1 Aux. Diesel Generator Storage Tank
106.472	9/4/2000	#2 Aux. Diesel Generator Storage Tank
106.472	9/4/2000	#3 Aux. Diesel Generator Storage Tank
SE 51	5/4/1994	Fire Pump Diesel Storage Tank
SE 51	11/5/1986	Underground Diesel Storage Tank
SE 51	11/5/1986	Unit # 1 Sulfuric Acid Tank
SE 51	11/5/1986	Unit # 2 Sulfuric Acid Tank
SE 51	11/5/1986	Unit # 3 Sulfuric Acid Tank
SE 51	11/5/1986	Unit #1 Turbine Oil Tank
SE 51	11/5/1986	Unit #1 Turbine Rest Tank
SE 51	11/5/1986	Unit #2 Turbine Oil Tank
SE 51	11/5/1986	Unit #2 Turbine Rest Tank
SE 51	11/5/1986	Unit #3 Turbine Oil Tank
SE 51	11/5/1986	Unit #3 Turbine Rest Tank
SE 51	11/5/1986	Solvent Tank
SE 53	11/5/1986	Underground Gasoline Storage Tank
SE 70	11/5/1986	Facility Maintenance
106.454	11/1/2001	Parts Degreasers
106.262	11/1/2003	PestWest Fluorescent Lamp Crusher
106.261	11/1/2003	Units 1, 2, and 3 - Wood and Law Enforcement Contraband
SE 08	6/7/1996	Units 1, 2, & 3 cooling towers north of the boiler buildings
106.227	9/4/2000	Welding Equipment and North & South Welding Shop Vents
106.102	9/4/2000	Val6 Infrared ultra efficient diesel comfort heaters

