Message

From: Raju Bisht [rbisht@navajo-nsn.gov]
Sent: 10/27/2017 4:27:35 PM
To: BECKHAM, LISA [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=75a0012699094cf59508bb04e90b393c-LBECKHAM]
CC: Tennille B. Begay [tbbegay@navajo-nsn.gov]; Prashanth Subburam [psubburam@navajo-nsn.gov]
Subject: NGS BART
Attachments: 2009 - 2016 NOx Emissions.pdf

Hi Lisa,

Regarding our conversation on NGS BART, below is the Alternative B operating scenario.

Alternative B. (*1*) Total cumulative NO_X emissions from Units 1, 2, and 3 may not exceed the 2009-2044 NO_X Cap or the 2009-2029 NO_X Cap.

(*2*) The owner/operator must cease operation of Units 1, 2, and 3 if total cumulative emissions of NO_X from Units 1, 2, and 3, based on annual reports required under paragraph (j)(4)(ii) of this section, exceed the 2009-2029 NO_X Cap at any time prior to December 31, 2029. The owner/operator may restart operation of Units 1, 2, and 3 after January 1, 2030, as long as total cumulative emissions of NO_X from Units 1, 2, and 3, based on annual reports required under paragraph (j)(4)(ii) of this section, do not exceed the 2009-2044 NO_X Cap.

(*3*) The owner/operator must permanently cease operation of Units 1, 2, and 3 if total cumulative emissions of NO_X from Units 1, 2, and 3, based on annual reports required under paragraph (j)(4)(ii)), exceed the 2009-2044 NO_X Cap at any time prior to December 31, 2044.

2009-2029 NO X *Cap* means a limit on emissions from Units 1, 2, and 3 of no more than 416,865 tons of NO_X.

(ii) *2009-2044 NO* X *Cap* means a limit on emissions from Units 1, 2, and 3 of no more than 494,899 tons of NOx

From the attached report, the three units have used up a total of 152,499 tons in the period 2009 – 2016.

In 2016, the three units used up 12,007 tons, looking at the averages from the last three years, let us say the 3 units use up 14,600 tons/year. For the period 2017 – 2029, they will use up 14,600 * 13 = 189,800 tons. This added to 152,499 gives 342,299 < 416,865 (2009-2029 NOx Cap). Now deducting 342, 299 from 494,899 which is the 2009-2044 NOx Cap leaves 152,600 tons. This divided by 14,600 is approximately another 11 years of operations which takes it to 2040. Assuming decrease in generation or even possible closure during the purchase period, it does not seem to be a problem to operate all three units till the end of the lease period.

Have a safe trip back!

Raju