BLUE SKY ENVIRONMENTAL LLC

September 23, 2014

Bonnie Braganza
Federal Minor NSR Permit Coordinator (PDR)
U.S. Environmental Protection Agency
Region 6
1445 Ross Avenue; Ste 1200
Dallas, Texas 75202-2733

Re: Amendment to Federal Minor New Source Review (NSR) Application for Indian Country Sandia Resort and Casino, Albuquerque, New Mexico

Dear Ms. Braganza:

On behalf of the Pueblo of Sandia, a sovereign tribal nation located in Bernalillo and Sandoval Counties, New Mexico, attached please find a second amendment to the Federal Minor Source Review (NSR) application under EPA's Federal Minor NSR Program in Indian Country that was submitted to you on August 30, 2012 and amended in a letter to you dated August 12, 2014. This amendment is in regards to the addition of three new diesel storage tanks:

- Two 410 gallon day tanks associated with each of the new 4,000 kW generators
- One 12,000 gallon tank

This application is in regards to the sources at the Sandia Resort and Casino located at 30 Rainbow Road NE, Albuquerque, New Mexico. Attached please find:

- EPA Application NEW for Application of New Construction (Federal Minor New Source Review Program in Indian Country)
- Updated Narrative Description
- Updated Process Flow Diagrams
- Tank Details including NSPS applicability and drawings

ESA and NHPA information was sent to you on September 19, 2014 via an email from Scott Bulgrin of the Pueblo of Sandia Environment Department. The emissions spreadsheet was sent to you yesterday via email by me.

The Pueblo of Sandia appreciates your review of the application and future issuance of this synthetic minor permit.

Ms. Bonnie Braganza US EPA Region 6 September 23, 2014

If you have any questions or require additional information, please do not hesitate to contact me at 617-834-8408 or at dom@blueskyenviro.com.

Sincerely,

Blue Sky Environmental LLC

Don C. DiCristofaro, CCM

President Attachments

cc: Joseph M. Rodriquez, Sandia Resort and Casino Facility Superintendent



United States Environmental Protection Agency Region 6

FEDERAL MINOR NEW SOURCE REVIEW PROGRAM IN INDIAN COUNTRY

Application for New Construction

(Form NEW)

Please check	all that	apply	to show	how you	are using	this form:

- ☐ Proposed Construction of a New Source
- ☐ Proposed Construction of New Equipment at an Existing Source
- ☐ Proposed Modification of an Existing Source
- ☐ Other Please Explain

Please submit information to following:

Federal Minor NSR Permit Coordinator U.S. EPA, Region 6 PDR 1445 Ross Ave Dallas, TX 75202

http://yosemite.epa.gov/r6/Apermit.nsf/AirP

The Tribal Environmental Contact for Region 6 http://www.epa.gov/region06/6dra/oejta/index.html

For more information, visit:

http://www.epa.gov/air/tribal/tribalnsr.html

A. GENERAL SOURCE INFORMATION

1. (a) Company Name		2. Source Name	
Preblo of Landia	· ·		
(b) Operator Name		Sandia Resort & Casir	10
Pueblo of Sandia			
3. Type of Operation		4. Portable Source?	Yes No
Casino		5. Temporary Source?	Yes No
6. NAICS Code 71320		7. SIC Code	
8. Physical Address (home base	for portable sources)		
30 Rainbow Road NE;	Albuquerque, NN	M 87113-2156	
9. Reservation*	10. County*	11a. Latitude*	11b. Longitude*
Pueblo of Sandia	Bernadillo	35deg12min23.32 sec N	106deg33min59.04W
12a. Quarter Quarter Section*	12b. Section*	12c. Township*	12d. Range*
6 and 7	1	11 North	3 East

^{*}Provide all proposed locations of operation for portable sources

been issued to this source. Provide as an attachment if additional space is necessary) Source Name on the Permit No air permits issued to date Permit Number (xx-xxx-xxxx-xxxx.xx) Date of the Permit Action Source Name on the Permit Permit Number (xx-xxx-xxxxx.xx) Date of the Permit Action Source Name on the Permit Permit Number (xx-xxx-xxxxx-xxxx.xx) Date of the Permit Action Source Name on the Permit Permit Number (xx-xxx-xxxxx-xxxx.xx) Date of the Permit Action Source Name on the Permit Permit Number (xx-xxx-xxxxx-xxxxxxx) Date of the Permit Action

B. PREVIOUS PERMIT ACTIONS (Provide information in this format for each permit that has

C. CONTACT INFORMATION

C. CONTACT INFORMATION				
Company Contact	D	Title		
Pueblo of Sandia; Joseph M. Rodrigue	z as Representati	VE Superintendent of Facilities		
Mailing Address	07440 0450			
30 Rainbow Road NW; Albuquerque, NM Email Address	8/113-2156			
jmrodriguez@sandiacasino.com				
Telephone Number	Facsimile Number			
505-796-7750				
	505-796-7617			
Operator Contact (if different from company contact)		Title		
Pueblo of Sandia; Paul Bitner		Electrical Supervisor		
Mailing Address				
30 Rainbow Road NW; Albuque	rque, NM 871	113-2156		
Email Address	· · · · · · · · · · · · · · · · · · ·			
pbitner@sandiacasino.com				
Telephone Number	per Facsimile Number			
505-771-5086				
Source Contact		Title		
Same as owner contact				
Mailing Address				
Email Address				
Telephone Number	Facsimile Number			
Compliance Contact	Title			
Frank Chaves	Pueblo of Sandia Environment Director			
Mailing Address	<u></u>			
30 Rainbow Road NW; Albuque	raue. NM 871	113-2156		
Email Address	1,			
fchaves@sandiapueblo.nsn.us				
Telephone Number	Facsimile Number			
505-771-5086				
	<u> </u>			

E. TABLE OF ESTIMATED EMISSIONS

The following tables provide the total emissions in tons/year for all pollutants from the calculations required in Section D of this form, as appropriate for the use specified at the top of the form.

E(i) - Proposed New Source

Pollutant	Potential Emissions (tpy)	Proposed Allowable Emissions (tpy)	
PM	0.07	0.07	PM - Particulate Matter PM ₁₀ - Particulate Matter less
PM ₁₀	0.07	0.07	than 10 microns in size
PM _{2.5}	0.07	0.07	PM _{2.5} - Particulate Matter less than 2.5 microns in size
SO _x	0.02	0.02	SOx - Sulfur Oxides NOx - Nitrogen Oxides
NO _x	0.01	0.01	CO - Carbon Monoxide
СО	0.80	0.80	VOC - Volatile Organic Compound
VOC	0.08	0.08 (doesn't incl tanks)	Pb - Lead and lead compounds
Pb	0	0	Fluorides - Gaseous and particulates
			H ₂ SO ₄ - Sulfuric Acid Mist H ₂ S - Hydrogen Sulfide
Fluorides	0	0	TRS - Total Reduced Sulfur
H ₂ SO ₄	0	0	RSC - Reduced Sulfur Compounds
H ₂ S	0	0	
TRS	0	0	
RSC	0	0	

Emissions calculations must include fugitive emissions if the source is one the following listed sources, pursuant to CAA Section 302(j):

- (a) Coal cleaning plants (with thermal dryers);
- (b) Kraft pulp mills;
- (c) Portland cement plants;
- (d) Primary zinc smelters;
- (e) Iron and steel mills;
- (f) Primary aluminum ore reduction plants;
- (g) Primary copper smelters;
- (h) Municipal incinerators capable of charging more than 250 tons of refuse per day;
- (i) Hydrofluoric, sulfuric, or nitric acid plants;
- (j) Petroleum refineries;
- (k) Lime plants:
- (l) Phosphate rock processing plants;
- (m) Coke oven batteries;
- (n) Sulfur recovery plants;
- (o) Carbon black plants (furnace process);
- (p) Primary lead smelters,
- (q) Fuel conversion plants;

- (r) Sintering plants;
- (s) Secondary metal production plants;
- (t) Chemical process plants
- (u) Fossil-fuel boilers (or combination thereof) totaling more than 250 million British thermal units per hour heat input;
- (v) Petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels;
- (w) Taconite ore processing plants;
- (x) Glass fiber processing plants;
- (y) Charcoal production plants;
- (z) Fossil fuel-fired steam electric plants of more that 250 million British thermal units per hour heat input, and
- (aa) Any other stationary source category which, as of August 7, 1980, is being regulated under section 111 or

112 of the Act.

E(ii) - Proposed New Construction at an Existing Source or Modification of an Existing Source

Pollutant	Current Actual Emissions (tpy)	Current Allowable Emissions (tpy)	Post-Change Potential Emissions (tpy)	Post-Change Allowable Emissions (tpy)
PM			2.66	2.66
PM ₁₀			2.66	2.66
PM _{2.5}			2.66	2.66
SO _x			0.10	0.10
NOx			53.99	53.99
CO			41.74	41.74
VOC			4.24	4.24
Pb			6.63E-5	6.63E-5
Fluorides			0	0
H ₂ SO ₄		The state of the s	0	0
H ₂ S			0	0
TRS			0	0
RSC			0	0

PM - Particulate Matter

PM₁₀ - Particulate Matter less than 10 microns in size

PM₂₅ - Particulate Matter less than 2.5 microns in size

SOx - Sulfur Oxides

NOx - Nitrogen Oxides

CO - Carbon Monoxide

VOC - Volatile Organic Compound

Pb - Lead and lead compounds

Fluorides - Gaseous and particulates

H₂SO₄ - Sulfuric Acid Mist

H₂S - Hydrogen Sulfide

TRS - Total Reduced Sulfur

RSC - Reduced Sulfur Compounds

[Disclaimers] The public reporting and recordkeeping burden for this collection of information is estimated to average 20 hours per response, unless a modeling analysis is required. If a modeling analysis is required, the public reporting and recordkeeping burden for this collection of information is estimated to average 60 hours per response .Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

Narrative Description

On July 13, 2009 the Sandia Resort and Casino (the "Casino"), an instrumentality of a federally recognized Indian tribe submitted a notification regarding three electrical generators at the Casino located at 30 Rainbow Road NE in Albuquerque, New Mexico at the Pueblo of Sandia Indian land. The notification was submitted pursuant to the EPA Memorandum entitled Potential to Emit (PTE) Transition Policy for Part 71 Implementation in Indian Country from John S. Seitz, Director, Office of Air Quality Planning and Standards, and Eric V. Schaeffer, Director, Office of Regulatory Enforcement, dated March 7, 1999 ("EPA Transition Memo"). As per the EPA Transition Memo, the EPA treated a source as non-major for the purposes of the Federal Operating Permits Program (Part 71) if its actual emissions are and remain below 50 percent of the PTE thresholds for major source status, for every consecutive 12-month period (beginning with the 12 months immediately preceding March, 1999) and it maintains adequate records to demonstrate that its actual emissions are kept below these levels. On July 1, 2011, the EPA promulgated the final rule for New Source Review ("NSR") in Indian Country. The final rule became effective on August 30, 2011. The EPA Transition Memo specifies that the PTE transition policy terminates when EPA adopts and implements a mechanism that can be used to limit PTE or EPA explicitly provides such a mechanism. Since this new minor NSR program for Indian Country adopts and implements a mechanism that can be used to limit PTE the PTE transition policy has been terminated by EPA. For sources, such as the Casino, that are currently operating under the EPA Transition Memo, synthetic minor permit applications are required by EPA by September 4, 2012. The synthetic minor permit application was submitted to EPA by the tribe on August 30, 2012.

Since the 2012 filing with EPA, the facility plans to install two Caterpillar 4,000 kW generators, Engine Model C175-20 (Model Year 2014, Tier 2 Certified, Emergency Use Only), later this year. Each generator will have a 410 gallon diesel fuel tank. In addition, a 12,000 gallon stand alone tank will also be added. Thus, the facility will operate the following emission sources:

- Two Caterpillar 4,000 kW Generators with 5,646 hp engines Model C175-20, Tier 2 Certified, Emergency Use Only (To be installed in late 2014)
- Two Detroit Diesel Model DDC 16V-4000 rated diesel stand-by generators, 2935 hp each
- One Detroit Diesel Model MTV 1000 rated diesel stand-by generator, 1,676 hp
- Three 1,000 gallon diesel Fuel Tanks
- Two 410 gallon diesel Day Fuel Tanks
- One 12,000 gallon diesel Fuel Tank
- Thirteen 2.07 mmBtu/hr natural gas fired boilers
- Four 0.99 mmBtu/hr natural gas fired boilers

The three Detroit Diesel generators are existing units and are currently used solely for emergency power during periods when electrical power from the local utilities is not available, testing/maintenance, and for non-emergency demand response ("DR") once the engines are upgraded. The engines associated with the three Detroit Diesel generators operate under the National Emission Standards for Hazardous Air Pollutants ("NESHAP") for reciprocating internal combustion engines ("RICE") as per 40 CFR 63 Subpart ZZZZ. The two new generators to be installed in late 2014 will have Tier 2 certified emergency only engines so the generators will be used for emergency use and testing/maintenance only. The engines will operate under EPA's New Source Performance Standards as per 40 CFR 60 Subpart IIII. The generators are driven by diesel-fueled RICE which are sources of emissions of regulated air pollutants and hazardous air pollutants ("HAPs"). The calculated HAP emissions are less than 1000 lb/yr for the limited operation of all the diesel generators, and therefore have no monitoring or applicable requirement with the exception of recordkeeping for 40 CFR 63 ZZZZ for the three older engines.

Once the engines for the three older generators (or a subset) have been upgraded to meet the non-emergency requirements of the RICE NESHAP as per 40 CFR 63 Subpart ZZZZ, the Casino plans to reenter the three generators (or a subset) back into a non-emergency demand response ("DR") program that could be called a maximum of 100 hours per year. The generators continue to operate for emergencies when electrical power is not available from the local utility and for testing/maintenance. All electrical generation is used onsite; electrical power is not sent to the grid. The generators are owned and operated by the Casino; however, participation in the DR program is managed by EnerNOC, Inc.

Bernalillo County, New Mexico falls is currently designated as an unclassified/attainment area with a major source threshold for oxides of nitrogen ("NO_x") of 100 tons per year ("tpy").

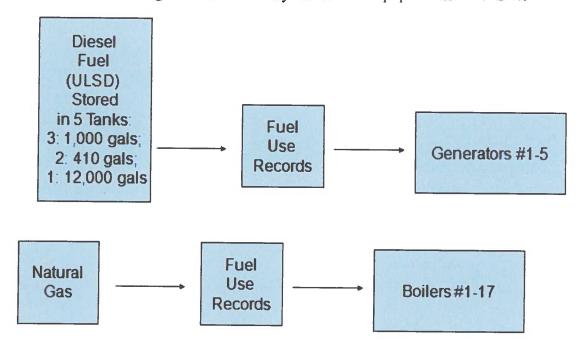
The EPA's NSPS for tanks is 40 CFR 60 Subpart Kb: Subpart Kb—Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. As per §60.110b(a):

...the affected facility to which this subpart applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (m³) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.

Since the largest fuel tank at Sandia will be the 12,000 gallon tank that is being constructed and this tank has a volume of 45 cubic meters; the tanks do not need to comply with Subpart Kb.

Process Flow Diagrams

The Process Flow Diagrams for the facility's emissions equipment is as follows:



The five generators use ultra low sulfur diesel fuel only (sulfur content 0.0015% or less). The three older generators have their own 1,000 gallon storage fuel tanks. The three older generators were installed prior to June 12, 2006. Thus, the three older generators operate under the EPA RICE NESHAP (40 CFR 63 Subpart ZZZZ). The engines associated with the two newest generators are Tier 2 emergency certified with a manufacture year of 2014; thus, they operate under the EPA New Source Performance Standards (40 CFR 60 Subpart IIII) as emergency engines. The two newest generators each have day tanks sized at 410 gallons each. In addition, a 12,000 gallon storage tank is being added. The boilers use natural gas only.

Tank Details

Day Tanks

Each of the 4,000 kW generators will have 410 gallon day tanks for the ULSD. Attachment 1 provides a schematic showing:

- Generator schematic with the day tank
- Day Tank Detail Sheet
- ACS Fuel Pump System Schematic

12,000 Gallon Tank

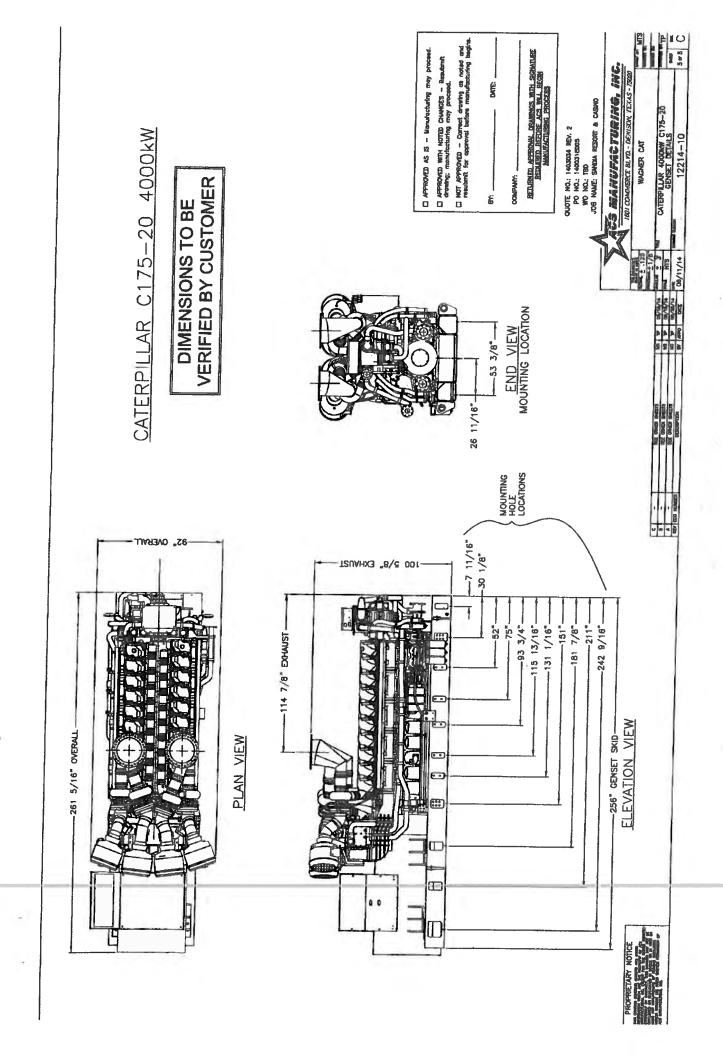
Attachment 2 provides:

- Location of proposed 12,000 gallon tank
- Schematic of 12,000 gallon tank
- Steel Tank Example

In addition:

- Fixed roof tank
- Tank Length: 34'1"
- Diameter of vertical cross section: 7'2"
- Tank Shell Height: 8' 9 1/4"
- Liquid Height: 8' (estimated)
- Tank Roof Height: 8' 9 1/4"
- Tank Color: Light Brown

Attachment 1 410 Gallon Day Tanks



 a.) FOR A CATERPILLAR 4000kW c175-20 GEN-SET. (12,470V) b.) FULLY ASSEMBLED ACOUSTICAL ENCLOSURE TO BE ANCHORED TO THE FOUNDATION. c.) PANEL JOHITS ARE SKIP WELDED AND CAULKED. d.) WIND LOAD - 120 MPH. e.) SEISMIC RATED - ZONE 4 OR EQUAL. f.) ROOF LOAD RATING - 40 LBS/SQ.FT. 	2. ENCLOSURE CONS RUCTION: a.) SKIN125 ALUMINUM SHEET (WALLS). b.) FRAMING - 5052 STRUCTURAL ALUMINUM CHANNEL & TUBING. c.) INNER INED - DEBEDDATE ALUMINUM CHANNEL & TUBING.	_	h.) INTAKE BAFFLE FAMELS (ALUMINUM CONSTRUCTION). h.) INTAKE MOTORIZED DAMPERS (ALUMINUM CONSTRUCTION — CD50). i.) DISCHARGE BAFFLE PANELS (ALUMINUM CONSTRUCTION). j.) DISCHARGE MOTORIZED DAMPERS— w/WEATHERPROOF MOTOR COVERS (ALUMINUM CONSTRUCTION — CD50). k.) EXTERNAL DISCHARGE HOOD — (ALUMINUM CONSTRUCTION — CD50).	3. DESIGN CONSTRUCTON: o.) AIR FLOW EATES; COMBUSTION — 11,975 CFM b.) PRESSURE DROPS; INLET & DISCHARGE LOUVERS/BAFFLES 0.5" W.G. OR LESS (TOTAL).	DESIGNED TO REDUCE THE GEN—SET EQUIPMENT NOISE LEVEL TO 85 dBA WHEN ME/SURED AT A DISTANCE OF 23 FEET FROM THE ENCLOSURE AND 5 1/2 FEET ABOVE GRADE. (PROVIDING THE EQUIPMENT NOISE DOES NOT EXCEED 126 dBA @ 3 FFFT)	4. PAINTING: a.) ALL EXTERIOR ALUMINUM SURFACES TO BE POWER TOOL CLEANED PER SSPC-SP3 AND PAINTED AS FOLLOWS;	* PRIMER - ONE COAT AMERON 370 (3-5 MILS DFT). * FINISH - ONE COAT OF DURATHANE DTM (3-5 MILS DFT). • ENCLOSURE INTERIOR WALL AND ROOF SURFACES WILL NOT BE PAINTED. b.) ALL CARBOII STEEL SURFACES TO BE POWER TOOL CLEANED PER SSPC-SP3 * PRIMER - ONE COAT AMEDAN 370 (3 5 0.000).
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E-MAIL: phillip.macha@acsmanufacturing.com PROJECT MANAGER: TONY PELLMAN TELEPHONE: 903.462.2028 E-MAIL: tony.pellman@acsmanufacturing.com E-MAIL: timmy.brent@acsmanufacturing.com SALES: TIMMY BRENT TELEPHONE: 903.462.2030 TELEPHONE: 903.462.2008 *CUSTOMER TO VERIFY AL SALES: PHILIP MACHA

☐ APPROVED AS IS — Manufacturing may proce

- 551"L x 164"W x 161"H

ESTIMATED SHIPPING SIZES:
a.) ENCLOSURE ASSEMBLY
b.) DAY TANK ASSEMBLY

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CONTACT INFORMATION

ACS

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96"L x 32"W x 68"H

- 26,000 LBS - 1,400 LBS

ENCLOSURE ASSEMBLY INCLUDING EXHAUST & ELECTRICAL
 DAY TANK ASSEMBLY

7. ESTIMATED WEIGHTS ARE AS FOLLOWS:

a.) TWO (2) GEN-SET ENCLOSURE ASSEMBLIES b.) TWO (2) DAY TANK ASSEMBLIES

ELECTRICAL: SEE 12214-10E.

QUANTITY REQUIRED.

ė. ı.

1. ENCLOSURE ASSENBLY:

☐ NOT APPROVED — Correct drawing as noted and resubmit for approval before manufacturing begins. ☐ APPROVED WITH NOTED CHANGES - Resubmit drawing: manufecturing may proceed.

REDUIRED BETDRE ACS WILL BEGIN PATE COMPANY: ä

OUOTE NO.: 1403334 REV. 2 PO NO.: 14033183063 WO NO.: T.B.D. JOB NAME: SANDA RESORT & CASINO

S MANUFACTURING, 1601 COMMERCE BLYD. DENISON, TEXA

ACOUSTICAL ENCLOSURE TEXT SHEET WAGNER CAT 12214-10 06/11/14 165 TP 08/74/14 EE 179 08/74/1

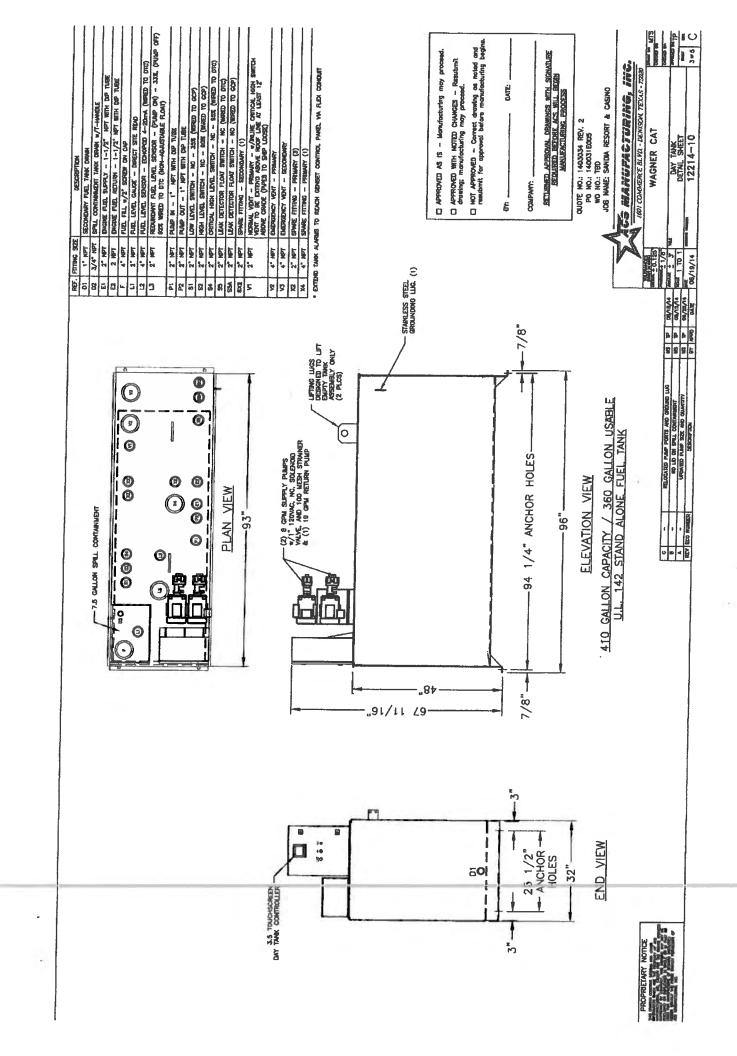
B A COD NUMBERS

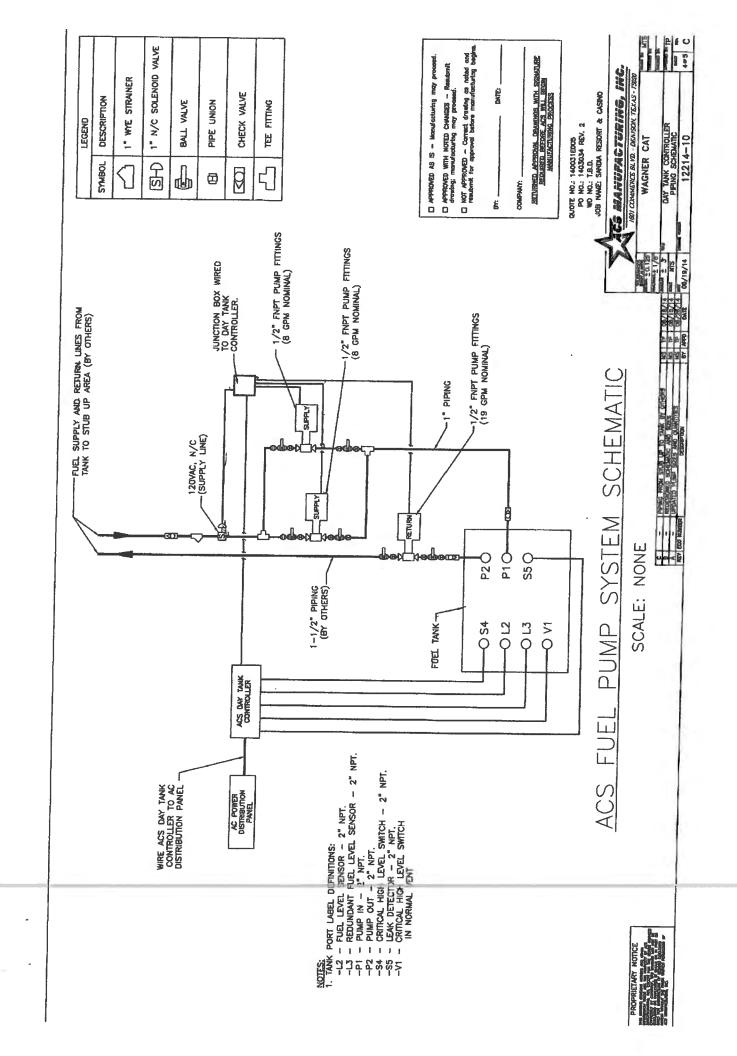
NOTES AND DIMENSIONS

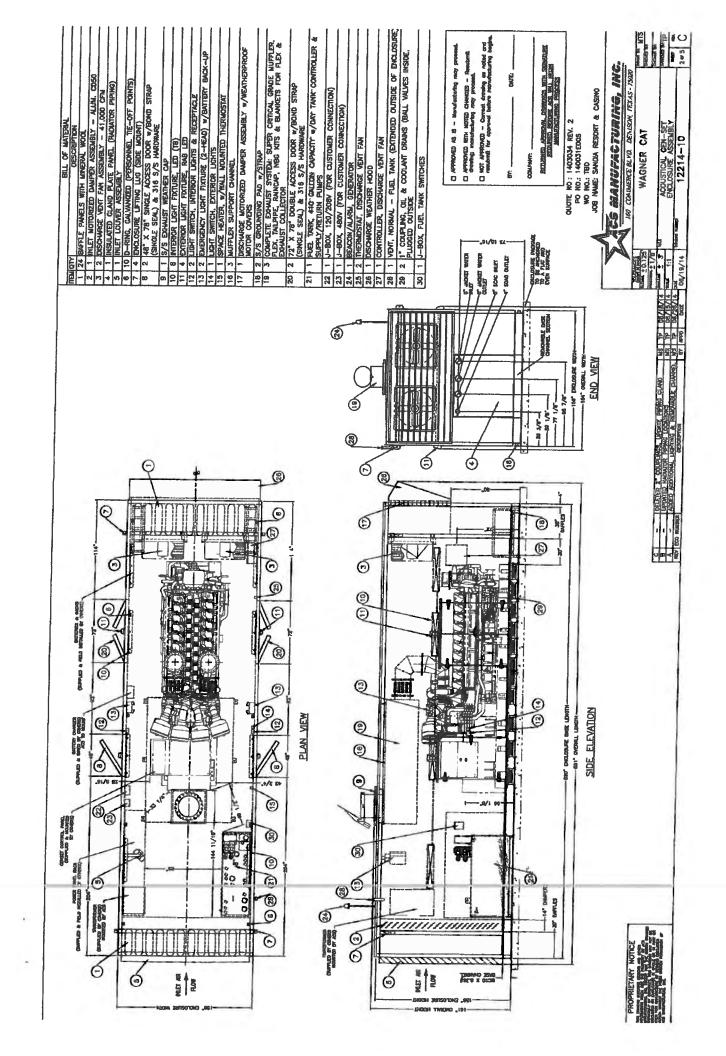
**LEXTERIOR ALUMINUM SURFACES TO BE POWER TOOL CLEANED PER SSPC—SP3
** PRIMER — ONE COAT AMERON 370 (3—5 MILS DFT).
** FINISH — ONE COAT OF DURATHANE DTM (3—5 MILS DFT).
** ENCLOSINE INTERIOR WALL AND ROOF SURFACES WILL NOT BE PAINTED.
**LECARBOI STEEL SURFACES TO BE POWER TOOL CLEANED PER SSPC—SP3
** PRIMER — ONE COAT AMERON 370 (3—5 MILS DFT).
** FINISH — ONE COAT OF DURATHANE DTM (3—5 MILS DFT).

c.) COLOR- T.E.D.

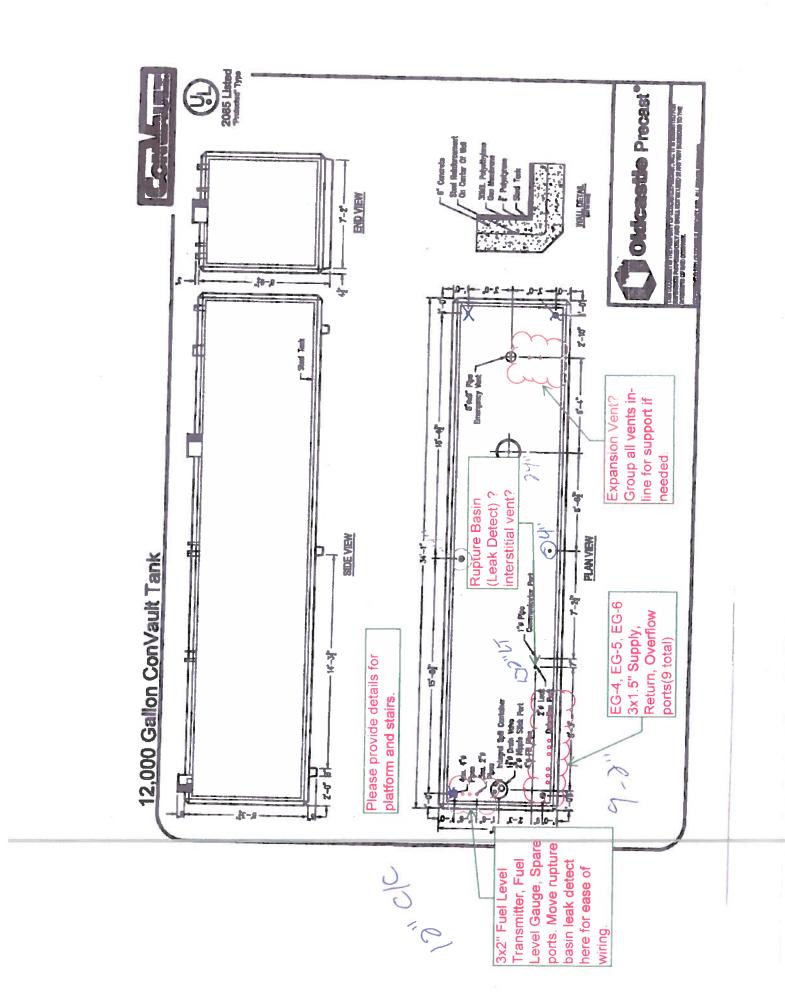
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Attachment 2 12,000 Gallon Tank



James P28-JAHY S A36 3/16" PLATE.
2 © 63-3/8" x 338-3/8" (BURN 1 PER DRWG)
2 © 86" x 336-3/8"
2 © 86" x 82-1/4" 353 313 কু -Bay

