



NAVAJO GENERATING STATION

P. O. BOX 850
PAGE, ARIZONA 86040

March 21, 2019

Oliver Whaley, Executive Director
Navajo Nation Environmental Protection Agency
P.O. Box 339
Window Rock, AZ 86515

Director of Enforcement Division
U.S. EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

Subject: 2018 NGS Annual Emission Report

Dear Mr. Whaley:

In accordance with 40 CFR §49 – Approval of Air Quality Implementation Plans; Navajo Nation; Regional Haze Requirements for Navajo Generating Station; Final Rule and NGS Title V permit condition (II.A.8.c):

Beginning in 2015, and annually thereafter until the earlier of December 22, 2044 or the date on which the owner/operator ceases conventional coal-fired electricity generation by all coal-fired Units at NGS, the owner/operator must report to EPA, the annual heat input, the annual emissions of sulfur dioxide, carbon dioxide, and NOX from the previous full calendar year.

In addition, the owner/operator must also report total cumulative emissions of NOX from NGS to assure compliance with the 2009-2044 NOX Cap and the 2009-2029 NOX Cap (if applicable). The owner/operator must make this report available to the public, either through a link on its website or directly on its website.

The report must be made available within 30 days of the submittal deadline associated with the annual emissions inventory required by the Part 71 Operating Permit for NGS [40 CFR §49.5513(j)(4)(ii)].

The 2018 emissions data are provided below and I am notifying you that this letter will be posted on the NGS public website to satisfy the public availability provision.

Navajo Generating Station 2018 Emissions

Year	Unit ID	Heat Input (MMBtu)	CO2 (short tons)	SO2 (tons)	NOx (tons)
2018	1	46,093,242.0	4,729,163.0	1,545.4	4,523.9
2018	2	52,312,572.1	5,367,264.0	2,205.0	4,569.8
2018	3	50,361,564.7	5,167,093.0	1,714.1	4,715.7

Navajo Generating Station Cumulative NOx Emissions

Year	Cumulative NOx Emissions (tons)	Cumulative NOx Emissions (tons)	Cumulative NOx Emissions (tons)
	Unit 1	Unit 2	Unit 3
2009	13,530.7	11,816.3	5,153.7
2010	26,173.2	17,194.5	11,559.5
2011	32,230.2	23,884.3	18,652.7
2012	38,166.3	29,146.4	23,922.9
2013	44,262.6	34,341.9	30,087.1
2014	49,809.8	40,743.5	36,028.7
2015	55,060.2	45,387.6	40,044.1
2016	59,285.3	49,204.4	44,009.5
2017	63,772.8	54,237.9	49,049.4
2018	68,296.7	58,807.7	53,765.2

Please contact me should you have questions.

Sincerely,

A handwritten signature in black ink that reads "Ken M. Ostyl for KJF". The signature is written in a cursive, flowing style.

Kenneth J. Frazier
NGS Plant Director