# EPA 114 Inspection Report December Update to CEWG

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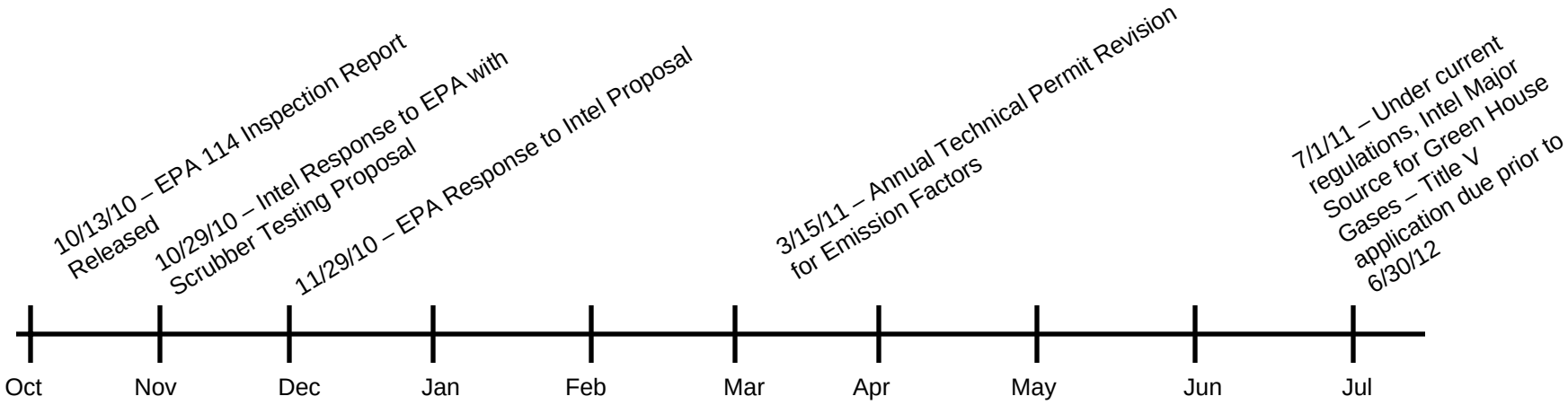
# Rough Timeline




- Stack Testing
  - Utilizing NMED testing protocol form
    - Form requires items such as test methods, testing durations, QA/QC procedures, etc. to be documented
    - Need NMED/EPA approval prior to scheduling the testing
    - Overall duration to complete form/get approval unknown (~6 weeks to submit/review/respond to initial letter)
  - Intel has currently proposed 3 weeks of scrubber inlet/outlet testing
  - 45-60 days for stack test report once testing is complete
- Permitting
  - Work with EPA and NMED on changes but changes have to be made under NMED permitting process
  - Permitting action will depend on changes being made to permit
  - 3 permitting options
    - Administrative Revision – approved when received by NMED
    - Technical Revision – 30-60 days to complete application, 60 days NMED processing time
    - Significant Permit Revision – 30-90 days to complete application, 30 days for NMED to deem application complete, 90-180 days NMED processing time
  - Annual Emission Factor Technical Permit Revision due 3/15/11
    - Would like to incorporate any agreed to appropriate changes w/EPA & NMED into this existing permitting revision – this would help expedite the process

# Scrubber Removal Efficiencies

- Intel proposed a testing plan which included monitoring scrubber operating parameters to EPA on 10/28/10
  - Intended to address 10 AOCs – A, B, C, I, J, K, L, M, N, O
- Intel received comments from EPA on the 10/28/10 proposal on 11/29/10
  - EPA has requested that Intel develop a detailed performance test program – EPA included specific elements that need to be addressed
  - Intel is currently working with our stack testing consultant to develop the program to meet EPAs request
- Propose using the following elements of the STTF to improve transparency to regulatory required testing
  - Perform educational sessions on the testing methods
  - Scheduling community witness sessions during the testing
  - Detailed review of final report and results