

February 3, 2015

Michael Owens  
Air Program (8P-AR)  
U.S. EPA, Region 8  
1595 Wynkoop St.  
Denver, CO 80202-1129

Dear Mr. Owens:

Deseret hereby submits additional (supplemental) comments to the proposed PSD Correction Permit for Bonanza unit 1, **PSD-UO-000004-2014-003**, without limiting or otherwise waiving any other comments filed on Deseret's behalf.

Deseret disagrees that EPA has authority to re-open and "correct" a final PSD permit issued over 14 years ago. If such authority does exist, the following additional corrections (in addition to those referenced in Deseret's primary comments) should be made before issuing any such correction Permit:

1. Deseret is not aware of any regulatory Part 71 authority for regulating fugitive emissions. Although the 2001 Federal PSD Permit incorporated conditions pertaining to fugitive emissions set forth in a Utah State approval order issued in 1998, EPA proposes, as a part of its *Statement of Basis*, that the Utah State permit action was null and void, and that the State of Utah was not the authoritative permitting agency at the time of the 1998 permit. EPA's inclusion of fugitive emission limits in the proposed Permit, and in the recent Title V operating permit, is both inconsistent with its own position related to the Utah State permit, and is not based on any federal regulation or requirement. Deseret renews in this context its comments as to fugitive emissions as set forth in its comments to the 2001 Federal PSD Permit Issued February 2, 2001.

2. **Page 10, IV(C)(1):** If the EPA does not remove the fugitive emissions section per the comment above, the paragraph should read:

*“The Permittee must water spray and/or chemically treat all unpaved roads and other unpaved operational areas that are used by mobile equipment to control fugitive dust. Treatment must be of sufficient frequency and quantity to **mitigate fugitive emissions during times of operation.** ~~maintain the surface material in a damp/moist condition.~~ The opacity must not exceed 20% during all times the areas are in use ~~or the outside temperature is below freezing.~~ If chemical treatment is to be used, the plan must be approved by the EPA. The Permittee must maintain records of water treatment for all periods when the plant is in operation. The records must include the following items:”*

It is not practicable to water literally 24/7 and all winter -- during times when areas are not even in active operation.

3. **Page 10, IV(C)(1)(b):** If the EPA does not remove the fugitive emissions section per the comment above, this line should read:

*“Number of treatments made, dilution ratio (**chemical treatment only**), and quantity.”*

Water treatments do not have a dilution ratio.

4. **Page 14, VII(F):** This section is not consistent with 40 CFR 60.51Da and Title V. The PSD should match the CFR reporting provision, as follows:

*“Continuous emission compliance reports. This report shall be compiled and submitted as required in 40 CFR 60. 51Da”.*

5. **Page 14, VII (F)(1):** 40 CFR 60. 51Da(j) and Title V Section II(A)(2)(g)(viii) only requires reporting to be done semiannually. The PSD should match the CFR reporting requirement.

6. **Page 14, VII (F)(1):** The last sentence of this paragraph uses the word “pollutant” without following the specificity in the CFR and the Title V, which spells out the pollutants involved (SO<sub>2</sub>, NO<sub>x</sub>, SO<sub>2</sub> reduction). The way it is written is vague and inconstant with the Title V Section II(A)(2)(g)(ii) and 40 CFR 60. 51Da(b). The PSD should match the Title V and CFR.

7. **Page 15, VII (F)(2):** This wording is requiring quarterly reports to be submitted. Refer to #5. The reporting period should be consistently semiannual.

8. **Page 16, VII (F)(3)(c)(d):** These are new reporting requirements not required by 40 CFR 60.51Da nor the consent decree from a few years ago. It should be deleted without express statute and/or regulatory grounds to require it.

9. **Page 16, VII (G):** These are new reporting requirements not required by 40 CFR 60.51Da. It should be deleted without express grounds to require it. The “quarterly” reporting requirement (there are a couple references stated throughout (G)) should to be changed to semiannual.

10. **Page 16, VII (H):** These are new reporting requirements not required by the CFR. It should be deleted as there are no grounds to require it.

11. Corrected PSD Page 7, Section III(A)(2): The PM10 testing requirement needs to be consistent throughout the PSD. This paragraph should read as follows:

*“The Permittee’s Bonanza Unit No.1 must not discharge to the atmosphere PM10 particulate matter at a rate exceeding 0.0286 lbs/MMBTU heat input as determined by 40 C.F.R. part 60, Appendix A, Methods 5, 5A, 5B, 5D, 5E, 5G or 5H, and 19, as appropriate. ~~5I, Appendix M, Method 201, Determination of PM10 Emissions or Method 201A, Determination of PM10 Emissions (Constant Sampling Rate Procedure).~~ The averaging time for this limit shall be consistent with the test method.*”

Refer to Number 13 below for additional reason for this change.

12. Corrected PSD Page 10, Section IV(C)(1): The following should be deleted from this sentence,

*“The opacity must not exceed 20% during all times the areas are in use ~~or the outside temperature is below freezing.~~”*

The deleted wording could imply that during the summer the 20% only exists if operators are working in an area and during the winter it is 24/7. This would not make any sense, and the correction would

clarify the intent.

13. Corrected PSD Page 12, Section VI(C)(1): This testing requirement was changed inappropriately as the test method proposed cannot be performed on a wet stack. (see technical guidance on website link provided below). The corrected version should read,

*“To demonstrate compliance ~~f~~For PM, the Permittee must use 40 CFR part 60, Appendix A, Methods 5, 5A, 5B, 5D, 5E, 5G or 5H, and 19, as appropriate. To demonstrate compliance ~~f~~For PM10, the Permittee must use 40 CFR part ~~51, Appendix M, Method 201 or Method 201A~~ 60, Appendix A, Methods 5, 5A, 5B, 5D, 5E, 5G or 5H, and 19, as appropriate.”*

Method 201/201A cannot be done on a wet stack (I confirmed this with AirTech, stack testers we use for MATS, that this is true) . Deseret is currently required to run a Method 202 (measures condensables on wet stacks) and add that to the PM from a Method 5. The summation is Total PM. If Total PM is less than PM10 limit, it proves compliance with PM10 because PM10 has to be less than the Total PM. deseret refers EPA to two sources to support the corrections proposed above.

- Websitelink: <http://www.epa.gov/ttnemc01/methods/method201a.htm>
- EPA Technical Information Document-009 (linked on website).

14. Corrected PSD Page 14, Section VII(E): This paragraph should be corrected as follows:

*“Continuous opacity monitoring system (COMS) operation and availability. The Permittee must maintain and operate a COMS **located between the baghouse and the wet scrubber at the main boiler stack**, during all periods of operation of the facility, including periods of startup, shutdown, malfunction or emergency conditions, except for COMS breakdowns and repairs. The COMS must comply with 40 CFR part 60, Appendix B, Performance Specification 1 (Specifications and Test Procedures for Continuous Opacity Monitoring Systems in Stationary Sources).”*

The COMS is not in the stack and will not work on a wet stack.

15. Corrected PSD Page 14, Section VII(F)(1)(b): This paragraph should be corrected as follows:

*“The average emission rate in lb/MMBtu for each 30 successive boiler operating days, ending with the last 30-day period in the quarter, identification of any periods of non-compliance with the applicable PSD BACT emission limit, reasons for non-compliance, and description of corrective actions taken. Periods of boiler operation during startup, shutdown or malfunctions must be included in the calculation of average emission rates if these hours are part of a boiler operating day. ~~No periods of Only non-boiler operating day’s data boiler operation may~~ will be excluded from these averages.”*

This is consistent with 40 CFR 60Da requirements for reporting on units initially permitted at the date of the Bonanza unit.

16. Corrected PSD Page 14, Section VII(F)(1)(c): This paragraph should be corrected as follows:

*“Identification of any boiler operating days for which pollutant ~~or diluent data~~ have not been obtained by an approved method under this permit, reasons for not obtaining the data, and description of corrective actions taken.”*

Reporting requirements in 40 CFR 60Da do not require diluent data. This should be deleted

Thank you,

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