April 15, 2024

Ref: 8ARD-AP-P

David Beatty - Manager

Operating Permits Section

Division of Air Quality

P.O. Box 144820

Salt Lake City, Utah 84114-4820

Re: EPA Comments on PacifiCorp Power Marketing – West Valley Power Plant

Dear David Beatty:

This letter is in response to the Utah Department of Environmental Quality’s (UDEQ) proposed draft renewal of the title V (TV) operating permit for the PacifiCorp Power Marketing – West Valley Power Plant (PacifiCorp). UDEQ’s public comment period for this permit ends on April 16, 2024.

After reviewing the draft TV permit action, EPA submits the following comments:

**Comments Related to Monitoring, Recordkeeping and Reporting**

Under 40 CFR 70.6(c)(1), each TV permit is required to contain all monitoring and analysis procedures or test methods to assure compliance.

Within the draft permit, the monitoring methods in Condition II.B.2.d.1, Condition II.B.2.f.1, and Condition II.B.2.g.1 rely on a conversion factor supplied by the Director to calculate emission rates of CO and NOx. For example, Condition II.B.2.d.1 states,

The emission rate (lb/hr) shall be calculated by multiplying the CO concentration (ppmdv) generated from CEMs and the volumetric flow rate and any necessary conversion factors determined by the Director to give the results in the specified units of the emission limitation.

The Director-supplied conversion factor is necessary for the source to calculate the emissions from the turbines. However, if the conversion factors are not available in the permit, incorporated by reference, or contained on another publicly available source such as a standard website location, then it is unclear how the source, the EPA and the public can assure compliance with the terms and conditions of the permit, as required by 40 CFR 70.6(c)(1). EPA recommends that the permit contain all testing and monitoring requirements, as required by CFR 70.6(c)(1), to assure compliance with permit terms.

Condition 12 of the Approval Order (AO) [AO DAQE-282-02] specifies the use of 40 CFR Part 60 Method 19 to calculate the emission rates of NOx and CO.

NOx emissions in lb/hr shall be calculated from the ppmvd CEMs recorded data using 40 CFR 60 App. A, Method 19. CO emissions in lb/hr shall be calculated from the ppmvd CEMs recorded based on 40 CFR 60 App. A, Method 19.

Method 19 Tables 19-1 and 19-2 detail conversion factors that can be used to calculate NOx and CO emission rates in lbs/day. The TV permit does not incorporate directly or by reference the methods used to measure NOx and CO that are detailed in the AO. AOs are generally the origin of authority for conditions in TV permits. TV permits should include applicable requirements, originating from New Source Review (NSR) permits and cite which permit they originated from. 40 CFR Part 70.6(a)(1) requires that each permit issued shall include:

Emissions limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of permit issuance.

The TV permit instructs the source to use Director-supplied conversion factors while the AO instructs the source to use Method 19 for sampling and calculating the emission rate, resulting in a TV permit that contradicts the AO requirements. EPA recommends that the permit be modified to provide clarity to the source, the EPA, and the public regarding the required way to calculate the emission rate in order to demonstrate compliance.

Conditions II.B.2.d.1, II.B.2.f.1, and II.B.2.g.1 in the TV permit require flow rate data to be used to calculate CO and NOx emission rates. However, the TV permit does not explain how to determine the flow rate. The only reference to flow rate in the AO is contained in Condition 11.E. This Condition requires the usage of 40 CFR, Part 60, Appendix A, Method 2 to calculate the volumetric flow rate which is needed to demonstrate compliance with emission limitations. It is unclear whether the TV permit intends for a similar usage of Method 2 during performance testing to be used for the emission rate calculations specified in Conditions II.B.2.d.1, II.B.2.f.1, and II.B.2.g.1. Furthermore, if flow rate determined using Method 2 is intended to be used in emission rate calculations, the TV permit itself does not specify what tests need to be completed, the frequency at which such tests need to be completed, and why the tests and corresponding flow rate data are sufficient to demonstrate ongoing compliance. If the flow rate is measured by the CEMS device that is used to monitor CO and NOx concentration, the permit does not specify its use or the frequency at which flow rate data shall be collected.

The permit does reference the AO when citing the origin of authority for the lbs/hour limits for CO and NOx, but does not reference the origin of authority to monitor, record or report flow rate data or to calculate emission rates for NOx and CO. 40 CFR Part 70 specifies that in addition to including the origin of authority, monitoring and analysis procedures or test methods must be incorporated into the TV permit. 40 CFR 70.6(a)(3)(i)(A) states:

All monitoring and analysis procedures or test methods required under applicable monitoring and testing requirements, including part 64 of this chapter and any other procedures and methods that may be promulgated pursuant to sections 114(a)(3) or 504(b) of the Act. If more than one monitoring or testing requirement applies, the permit may specify a streamlined set of monitoring or testing provisions provided the specified monitoring or testing is adequate to assure compliance at least to the same extent as the monitoring or testing applicable requirements that are not included in the permit as a result of such streamlining.

Flow rate data, conversion factors, and the methods used to obtain that data are the monitoring and analysis procedures or test methods that are necessary to assure compliance with the emission limits for NOx and CO, and must be included in the TV permit.

The EPA recommends UDEQ incorporate into the TV permit the conversion factor used to calculate CO and NOx emissions and the appropriate method(s) to determine flow rate. Methods and conversion factors shall be included as necessary to assure compliance with applicable requirements.

If you have any questions, or if you would like to schedule a meeting to discuss this matter further, please contact Donald Law at Law.Donald@epa.gov or (303) 312-7015. We look forward to hearing from you and working with you on this permit.

Sincerely,

Adrienne Sandoval

Director

Air and Radiation Division