Owens, Mike

From: Owens, Mike
Sent: Monday, May 18, 2015 4:17 PM
To: 'eolsen@deseretpower.com'
Cc: Rothery, Deirdre; Laumann, Sara
Subject: Request for Administrative Amendment to Deseret Power's title V permit

Eric,

The purpose of this email is to respond to your email request dated March 31, 2015, with followup email on April 23, 2015, for administrative amendments to the Deseret Bonanza title V permit that Region 8 issued on December 5, 2014. Please be aware that the request needs to include a reason for each amendment that makes it clear why the amendment can be classified as an "administrative amendment" under 40 CFR 71.7(d). I offer suggested language below to accomplish this.

Regarding the request to change the permittee name to "Deseret Generation & Transmission Co-operative," we have no issue with this request, which is to correct an inadvertent error.

Regarding the seven additional amendments you requested:

Item 1: You requested that an "Explanatory Note" be added, pertaining to condition II.A.2.(e)(ix) on page 31 of the title V permit, to say that requirements of 40 CFR Part 75 satisfy the 40 CFR Part 60 requirement for the outlet SO2 CEMS span value. In a phone conversation later on March 31, you agreed with me that, rather than add an "Explanatory Note," it would be more straightforward to simply add the relevant language from 40 CFR 60.49Da(i)(5), which says that for affected facilities determining span values under 40 CFR 60.49Da(i)(3)(ii), SO2 span values shall be determined according to section 2.1.1 in appendix A to 40 CFR Part 75. Please be sure to explain that you are making this request because Deseret Power operates a dual-span SO2 CEMS, which is accounted for in Part 60 via the cross-reference to Part 75, and that EPA inadvertently omitted this cross-reference in the title V permit.

Item 2: You requested that a paragraph under condition II.A.3.(d)(ii), appearing at the bottom of page 54 of the title V permit, be amended to reflect the current version of 40 CFR 63.10031(f), by saying that until April 16, 2017, results of performance tests required by 40 CFR Part 63, Subpart UUUUU, must be submitted to EPA's ECMPS database, and that after April 16, 2017, the results must be submitted to EPA's CEDRI database.

I have examined the current version of 40 CFR 63.10031(f) and find that it will be necessary to not only amend the paragraph at the bottom of page 54 of the title V permit, but to also add a paragraph on the next page of the permit, to lay out the requirements of 40 CFR 63.10031(f)(6), which was apparently added to the regulations after EPA issued the title V permit. ECMPS reporting now appears under a different paragraph in the regulations from CEDRI reporting.

Please be sure to explain that you are making this request because 40 CFR 63.10031(f) was revised by EPA after the title V permit was issued, therefore the permit is now in error by not accurately reflecting the current requirements. We have no issue with this request.

Item 3: After discussion with me on March 31, 2015, you agreed to drop this request, pertaining to condition II.A.6.(a)(vii)(C) of the title V permit, on frequency of opacity reporting.

Item 4: After discussion with me on May 12, 2015, you agreed to drop this request, pertaining to condition II.A.6.(b)(ii) of the title V permit, on reporting compliance with the requirement to achieve at least 90% SO2 removal efficiency.

Item 5: You requested correction of two typos on page 67 of the title V permit. The cross-references to conditions II.A.5.(b) and II.A.5.(c) should have been to II.A.6.(b) and II.A.6.(c), respectively. We have no issue with this request.

Item 6: You requested that page 2 of Attachment 1 of the title V permit (Process Description) be amended to correct inadvertent errors, and to read as follows (strikethrough is delete, red is add):

> *Limestone is ground on site in ball mills and mixed with water to a density ~~of~~ between 30% and 35% to produce the needed slurry. The slurry is mixed into the absorber modules to the module percent solids between 13% and 17%, with a pH between ~~5.5~~ 5.3 and 6.0. The base and lower portion of each module tower is the slurry reaction tank. Each module also includes a bulk entrainment separator and mist eliminator vanes for water droplet removal. A mist eliminator cleaning system is used to clean the vanes. On occasion, scrubber enhancers such as adipic acid are added to the slurry as needed to aid in the removal process. The solids formed in the scrubbing process are removed by a sludge handling system, mixed with flyash and conveyed or trucked to an on-site landfill.*

We have no issue with this request.

Item 7: You requested that page 3 of Attachment 1 of the title V permit (Process Description) be amended to correct inadvertent errors, and to read as follows (strikethrough is delete, red is add):

> *Stack parameters: The plant's main boiler stack is ~~604~~ 600 feet high. It is constructed with a concrete shell and acid resistant brick liner. The exit diameter is 26 feet with an average exit temperature of about 120 degrees F. The stack flow rate at full load is estimated to be about 1.3 million SCFM with the new ruggedized rotor installed and operating.*

We have no issue with this request.

Please be aware that the request for administrative amendment needs to be in the form of a letter to EPA from Gene Grindle, who is identified as the Responsible Official in the title V permit. The request should be addressed to:

Carl Daly, Director
Air Program (8P-AR)
US EPA Region 8
1595 Wynkoop Street
Denver, CO 80202-1129

The request should be accompanied by the Part 71 form called a Certification of Truth, Accuracy and Completeness (CTAC). I believe you are already familiar with how to find that form on EPA website, but if not, please feel free to give me a call at 303-312-6440.

Thank you.

Mike Owens
Environmental Engineer
Air Program
EPA Region 8
303-312-6440