Owens, Mike

From: Dave Crabtree [Crabtree@deseretpower.com]
Sent: Thursday, March 27, 2014 2:29 PM
To: Owens, Mike; Rothery, Deirdre
Cc: Eric Olsen; Laumann, Sara
Subject: Re: Compliance Assurance Monitoring -- Bonanza 1

Deirdre and Mike,

We are working on a response to the e-mail received from Region 8 on February 26, 2014 (attached below) and anticipate forwarding a proposal to you by the end of next week (April 4, 2014).

Although slightly outside of Mike's requested response time (30 days), hopefully, you can accommodate the extra few days. This allows us to be more confident on the proposal to address a potential CAM Plan in the context of the pending Title V application.

In general terms, although Deseret does not necessarily agree that the initial Title V permit application for Bonanza, must include a proposal to implement a potential plan that includes PM CEMS for limited purpose of CAM Plan monitoring, there may be a negotiated proposal similar to the recent Colstrip consent that might work. That would permit the application to propose a CAM Plan with a PM CEMS to be implemented within a reasonable time following finalization of a Title V permit.

If the additional time we are suggesting is problematic, please feel free to contact me or Eric Olsen.

David Crabtree
Deseret Power
Tel. (801) 619-6500

From: Owens, Mike [mailto:Owens.Mike@epa.gov]
Sent: Wednesday, February 26, 2014 1:58 PM
To: Eric Olsen
Cc: Rothery, Deirdre; Laumann, Sara
Subject: Compliance Assurance Monitoring

Eric,

This is to inform you that, after further considering applicability of the Compliance Assurance Monitoring (CAM) rule at 40 CFR part 64, EPA has determined that the Bonanza plant is subject to CAM with respect to particulate matter and PM10 emission limits for Unit 1. Those limits are 0.0297 lb/MMBtu for particulate matter and 0.0286 lb/MMBtu for PM10.

Please see the attached letter that our office wrote to Deseret Power on March 30, 1999. The letter requests that Deseret Power examine 40 CFR 64.2 to determine applicability of the CAM rule and, if subject, submit the information required under 40 CFR 64.4, which we typically refer to as a "CAM plan." 40 CFR 64.5(a) states that the information required under 40 CFR 64.4 must be submitted as part of the Part 71 permit application, if the application has not been filed by April 30, 1998, or has not yet been

determined complete by the permitting authority by that date. Deseret Power first submitted a Part 71 permit application to EPA in March of 2000. The application did not include a CAM plan.

The updated Part 71 permit application submitted by Deseret Power on April 3, 2012 also did not include a CAM plan. Instead, the application states that Part 64 does not apply to Unit 1 because it is exempted from CAM under 40 CFR 64.2(b)(iii) and 64.2(b)(vi). (These citations should actually be 64.2(b)(1)(iii) and (vi).) The first exemption, at 64.2(b)(1)(iii), says the requirements of Part 64 shall not apply to any of the emission limitations or standards under the Acid Rain Program. For Bonanza Unit 1, Acid Rain Program emission limitations or standards exist only for SO2 and NOx, not for particulate matter or PM10. The second exemption, at 64.2(b)(1)(vi), says the requirements of Part 64 shall not apply to any emission limitations or standards for which the Part 71 permit specifies a continuous compliance determination method. For Bonanza Unit 1, continuous compliance determination methods are specified in the draft 2002 Part 71 permit only for SO2 and NOx, not for particulate matter or PM10. No requirements have come into effect since 2002 that specify continuous compliance determination methods for particulate matter or PM10 at Bonanza Unit 1.

The three criteria for determining whether a pollutant-specific emitting unit (PSEU) is subject to Part 64 are laid out in 64.2(a). For particulate matter and PM10, Bonanza Unit 1 meets all three criteria. Therefore, it will be necessary for Deseret Power to submit a CAM plan for particulate matter and PM10 emissions from Bonanza Unit 1. Please do so if at all possible within the next 30 days. If there is any reason why you need more time, please notify me. If you would like some orientation on the CAM rule or examples of CAM plans, please feel free to let me know. You might find the CAM Guidance Document to be helpful as well. It has some examples. It's at www.epa.gov/ttn/emc/cam.html.

Thank you for your cooperation.

Mike Owens

Environmental Engineer

Air Program
EPA Region 8

303-312-6440

<Deseret Bonanza - Unit 1 T5 - 03-30-99 EPA letter to Deseret.pdf>