Owens, Mike

From: Owens, Mike
Sent: Monday, March 18, 2013 12:59 PM
To: Eric Olsen
Subject: RE: Deseret's RICE
Attachments: Deseret Bonanza - Unit 1 T5 - 09-16-02 Deseret comments.pdf

Thanks Eric. FYI, attached are comments that Deseret Power submitted on September 16, 2002, on the 2002 version of the draft operating permit. I have already prepared responses to those comments, so I have no questions about them.

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

From: Eric Olsen [mailto:eolsen@deseretpower.com]
Sent: Monday, March 18, 2013 7:59 AM
To: Owens, Mike
Cc: Dave Crabtree; Gene Grindle
Subject: Deseret's RICE

Mike,

Last Thursday you requested that I email you the horsepower ratings and the startup dates for our RICE units in order for you to have the correct info in our Title V. They are as follows.

Emergency Diesel Generator
Rating = 1220 hp
Startup date = 1-8-13

Emergency Diesel Fire Pump
Rating = 498 hp
Startup Date = mid 1980's

I did get your voicemail concerning 40 CFR 82 Subpart H, Halon Emissions Reduction. I looked through the previous applications and this subpart was not addressed. I do not have a copy of the 2002 letter you referenced. I have a meeting here in a little bit. After I get out I'll give you a call to discuss this. We do have a Halon system in a few areas used for fire suppression, but reading the subpart I'm not sure it would apply to us. That's where I would like to talk it through with you. We'll talk soon.

Thanks,

Eric C. Olsen, P.E.
Environmental Compliance and Process Superintendent
Deseret Power Electric Cooperative
Bonanza Power Plant
12500 East 25500 South
Vernal, UT 84078-8525
Office: (435) 781-5706
Cell: (801) 842-1007
Fax: (435) 781-5816

DESERET POWER
ELECTRIC COOPERATIVE

12500 East 25500 South
Vernal, Utah 84078
(435) 789-9000 Fax (435) 781-5810

September 16, 2002

Part 71 Permitting Contact- Michael B. Owens
Air and Radiation Program (8P-AR)
999 18th Street, Suite 300
Denver, Colorado 80202-2466

Re: Comments on Draft Title V Permit

Dear Mr. Owens:

Deseret is pleased to comment on the draft Title V operating permit V-OU-0004-00.00 for the Bonanza Power Plant. Deseret appreciates the amount of time and effort you and your colleges at Region 8 have put in during this permitting effort. This Title V permit represents the efforts of many people from Region 8, the State of Utah Division of Air quality and Deseret Power. This permit will enable the Bonanza Power Plant to remain one of the cleanest coal fired power plants in the world.

First, we have reviewed your analysis of the Deseret comments on the pre-draft permit. We agree with the resolution of all the Deseret comments except for the issue of subpart Y applicability to the coal storage and conveying equipment at the plant. Deseret feels that any subpart Y permit conditions should apply only to the coal crusher building. Your comments and the permit language allude to the fact that during the operation of the crusher the coal handling equipment is treated as part of the subpart Y system and when the crusher is not running, the coal handling equipment is part of the subpart Da facility. Deseret still feels that the coal unloading, storage and conveying systems at the plant are part of the subpart Da facility and not part of the subpart Y facility. The above mentioned systems run independently of the crusher and are an integral part of the entire generating system not the crusher.

60.251 (i) refers to equipment used to transfer or load coal for shipment. No coal is shipped from the plant.

The following are the comments on the draft permit:

1. On page 8 in the description section, there is a period in between "fired" and "on" in the third sentence.

2. On page 11 under (ii) in the last sentence, "auithority" is misspelled.

3. On page 25 in paragraph (x)(1), "udner" is misspelled.

4. On page 26 in paragraph f (1), there is a missing space between "under$60.8"

5. On page 30 in paragraph (ix) should the words "semiannual and semiannually" be hyphenated?

6. On page 31 in paragraph (I), there is a period between EPA and Regional

7. On page 32 in paragraph (v) and (iii) should "EPA-approved" be hyphenated?

8. On page 37 in paragraph c. (iii) (1) should the word "subaccount" be hyphenated?

9. On page 48 in paragraph III.C. 1 should the words " semiannual and semiannually" be hyphenated?

10. On page 49 in paragraph (I), there needs to be a space in between pollutant(as identified.

11. On page 58 in paragraph IV.E.1 should "reissuing" be hyphenated?

12. On page 59 in paragraph IV.H should the words "reissue and reissuance" be hyphenated?

13. On page 59 in paragraph IV.I.1.e should "preconstruction" be hyphenated.

14. On page 2 of attachment 1 in the second paragraph "Pollution Control Systems", "ABB wet scrubber" should be changed to "Combustion Engineering wet scrubber".

15. On page 3 of attachment 1 in the paragraph "Low NOx Burners", "Advanced Technologies" should be "Advanced Burner Technologies".

If you have any questions regarding these comments please contact Howard Vickers or Mike Goddard at the plant.

Sincerely,

Stanley J. Gordon
Plant Manager

Cc: David Crabtree