Owens, Mike

From: Eric Olsen <eolsen@deseretpower.com>
Sent: Monday, March 30, 2015 4:02 PM
To: Owens, Mike
Cc: Kinard, Sherrie; Dave Crabtree; Gene Grindle
Subject: Bonanza Questions

Mike,

I appreciate your time today answering the questions below that I had asked you on the phone. Just to follow up from our phone call, I've summarized the questions I asked and included what I learned with regards to the SO2 CEMS span value (so Sherrie is in the loop as well).

1. **Since our Title V has been appealed and not effective, do you want me to submit the Title V semi-annual, annual, and Method 9 reports required by Part 71?**
   You corrected me and said our Title V is still in effect with an effective date of January 7, 2015 and that it was not stayed due to the appeals. I will make sure these reports are submitted and postmarked by the April 1 deadline per the permit requirement. I will mail a copy by certified mail and then follow up with an email (electronic copy).

2. **Does Part 75, Appendix A, 2.1.1.4 supersede Part 60.49Da(i) for the Outlet SO2 CEMS span value (Title V, page 30-31)?**
   You recommended that I call Robert Vollaro at headquarters to answer this question. He does know a lot concerning Part 60 & 75 and was very helpful. What I found out is Part 75 does supersede Part 60. I would recommend a new Explanatory Note in our Title V permit to clarify this (add to page 31). Just to refresh, Part 60 requires 50% of the MPE (which would be 400 ppm for Bonanza). Part 75 requires a Dual Span SO2 CEMS with a Low Span somewhere between 40 to 100 ppm (currently we are running 50 ppm) and a High Span of 800 to 1000 ppm (currently we are running 1000 ppm). Robert suggested that I look into changing our Low Span SO2 to 100 ppm and showed me the reference in 60.49Da(w) why this would be a positive change and still meet regulations. I am going to look into this change.

   Concerning the superseding of Part 60 by Part 75, it can be found at:

   > §60.49Da(i)(5) For affected facilities burning fossil fuel, alone or in combination with non-fossil fuel and determining span values under paragraph (i)(3)(i) of this section, the span value of the SO2 CEMS at the inlet to the SO2 control device is 125 percent of the maximum estimated hourly potential emissions of the fuel fired, and the outlet of the SO2 control device is 50 percent of maximum estimated hourly potential emissions of the fuel fired. For affected facilities determining span values under paragraph (i)(3)(ii) of this section, SO2 span values shall be determined according to section 2.1.1 in appendix A to part 75 of this chapter.

   Paragraph (i)(3)(ii) refers to the NOx span that is explained in the Explanatory Note (second one) on Page 31 in the Title V permit. We do use 500 ppm for NOx as this note explains per Part 75. Therefore, the Part 60 SO2 CEMS span value is regulated and superseded by Part 75, Appendix A, 2.1.1.4.

Once again thanks for your help today.

Thanks,
Eric C. Olsen, P.E.

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