UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

file

FEB 4 1981

REF: 8AH-A

CERTIFIED MAIL - PO
RETURN RECEIPT REQUESTED

Mr. Merrill J. Millett, General Manager
Deseret Generation and Transmission Cooperative, Inc.
Box BB
Sandy, Utah 84070

Dear Mr. Millett:

We have completed final review of your application to construct and operate a coal fired electric generating plant (Moon Lake) and hereby issue conditional approval pursuant to U.S. Environmental Protection Agency (EPA) Prevention of Significant Deterioration (PSD) of Air Quality regulations, 40 CFR, Section 52.21 (as amended 43 FR 26388).

The conditional permit shall become effective in accordance with Article IV of the enclosed permit. Construction and operation may not take place if this permit or any part thereof is rejected.

If you have any questions, please contact Mr. Norm Huey of my staff at (303) 837-3763.

Sincerely yours,

Original signed by Robert L. Duprey

Robert L. Duprey, Director
Air and Hazardous Materials Division

Enclosures

cc: Mr. James Lents
Mr. Brent Bradford

bcc: W. McClave, 8RC
C. Phillips, 8E
K. Tipton, 8S&A

CONCURRENCES

SYMBOL	8AH-A	8AH-A		SPC	SAH			
SURNAME	Rachal	Rachal for RRP		Lum	Duprey			
DATE	2/4/81	2/4/81		2/4/81	2/4/81			

8AH-A:RACHAL:11/6/80:3711:24853

EPA Form 1320-1 (12-70)

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CONDITIONAL PERMIT TO
COMMENCE CONSTRUCTION AND OPERATE

40 CFR 52.21
Significant Deterioration of Air Quality
Review of New Sources

Deseret Generation & Transmission Cooperative
Two 400 MW Units
Bonanza, Utah

I. INTRODUCTION

Deseret Generation & Transmission Cooperative (hereinafter "the Applicant") plans to construct two 400 megawatt coal-fired electric generating units (hereinafter "the Source") approximately 7 miles northwest of Bonanza in Uintah County, Utah.

On August 4, 1980, the Applicant requested from the U. S. Environmental Protection Agency, Region VIII (hereinafter "EPA"), permission to construct the Source at a location near Bonanza, Utah.

II. FINDINGS

On the basis of information in the administrative record (see appendix I for partial listing), EPA has determined that:

(1) The Applicant, through application of BACT as defined in 40 CFR, Section 52.21, will limit emissions from the units as set forth in III below;

(2) The following Class I areas are nearest the proposed site: Arches National Park, 88 miles south; Flat Tops Primitive Area, 89 miles east; and Mount Zirkel Wilderness Area, 131 miles northeast of the site.

(3) The Source will not cause exceedances of applicable air quality increments;

(4) Violations of the national ambient air quality standards will not be caused or exacerbated by the facility;

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A listing of the record to date considered by EPA in its review is contained in appendix I.

II. FINDINGS

On the basis of information in the administrative record (see appendix I for partial listing), EPA has determined that:

(1) The Applicant, through application of BACT as defined in 40 CFR, Section 52.21, will limit emissions from the units as set forth in III below;

(2) The following Class I areas are nearest the proposed site: Arches National Park, 88 miles south; Flat Tops Primitive Area, 89 miles east; and Mount Zirkel Wilderness Area, 131 miles northeast of the site.

(3) The ~~Deseret Generation & Transmission Cooperative Unit~~ Source will not cause exceedances of applicable air quality increments;

(4) Violations of the national ambient air quality standards will not be caused or exacerbated by the facility;

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

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(5) EPA has good reason to believe that the Applicant can comply with the conditions of this permit. However, in the issuance of this permit, EPA does not assume any risk of loss which may occur as a result of the commencement of construction and operation by the Applicant, if conditions of this permit are not met by the Applicant.

III. CONDITIONAL PERMIT TO CONSTRUCT AND OPERATE

On the basis of the findings set forth in II above, and pursuant to the authority (as delegated by the Administrator) in 40 CFR 52.21, EPA hereby grants conditional approval for the Deseret Generation & Transmission Cooperative to commence construction and operation of two 400 MW coal-fired electric generating units. This approval is expressly conditioned as follows:

(1) The plant shall not cause to be discharged into the atmosphere sulfur dioxide at a rate exceeding:

(a) 10 percent of the potential combustion concentration (90 percent reduction) as averaged over 30 successive boiler operating days from unit 1 (unit 2 emission limit to be established at a later date), and

(b) 418 pounds per hour as averaged over 30 successive boiler days from units 1 and 2 combined.

(c) Compliance with the emission limitations of this condition shall be based solely on data from the Continuous Emission Monitors (CEM) as provided for in condition 4 and appendix III of this permit. Compliance with the percent reduction requirements of (1)(a) may be based on a combination of CEM and fuel analysis data as provided for in 40 CFR 60, appendix A, method 19 in place of CEM's at the inlet and outlet of the sulfur control device.

(2) Unit 1 shall not cause to be discharged into the atmosphere particulate matter at a rate exceeding (unit 2 emission limit to be established at a later date):

(a) 0.030 pounds per million Btu heat input, and

(b) Opacity of 20 percent, as averaged over each separate 6-minute period, except for one 6-minute period per hour of not more than 27 percent opacity.

(c) Compliance with part (a) of this condition shall be as provided for in 40 CFR 60, appendix A, method 5. Four (4) 2-hour runs shall be conducted as provided for in 60.8 of appendix III. Compliance with part (b) shall be as provided for in 40 CFR 60, appendix A, method 9 and data from CEM under condition (4) and appendix III of this permit.

(3) Unit 1 shall not cause to be discharged into the atmosphere nitrogen oxides, expressed as NO_2, at a rate exceeding 0.550 pounds per million Btu heat input based on a 30-day rolling average (unit 2 emission limit to be established at a later date). Compliance with this emission limit shall be based solely on CEM data as provided for in condition (4) and appendix III of this permit.

(4) A continuous monitoring system for measuring opacity, optical density, sulfur dioxide, nitrogen oxides, and diluent shall be installed, calibrated, maintained, and operated by the owner or operator. Procedures to be followed for (1) testing, monitoring, and reporting of excess emissions of particulates, opacity, sulfur dioxide, and nitrogen oxides, and for (2) the purposes of demonstrating compliance with the emission limitations of conditions (1), (2), and (3) are specified in the applicable sections of 40 CFR 60.7, 60.8, 60.11, 60.13, subpart Da, and Reference Methods Performance Specification Nos. 1, 2, and 3, of 40 CFR Part 60, appendices A and B, as is amended by appendix III of this permit, and which is incorporated as a part of this condition by reference. Production weighted values referred to in appendix III are not applicable to this permit.

A quality control program for the continuous monitoring system must be developed and implemented. As a minimum, the quality control program must have written procedures for each of the following activities:

(a) Installation of CEM's

(b) Calibration of CEM's

(c) Zero and calibration checks and adjustments for CEM's

(d) Preventive maintenance for CEM's (including parts inventory)

(e) Data recording and reporting

(f) Program of corrective action for inoperable CEM's

(g) Annual evaluation of CEM system

The quality control program must be described in detail, suitably documented, and approved by EPA Region VIII's Quality Assurance Office.

(5) (a) The Applicant shall submit to EPA all plans which relate to the design, engineering, and operation for the particulate, NO_x and SO_2 control systems. The information shall include, at a minimum, a description of the system's operation, major design parameters, and efficiency or emission rate guarantees. Such information should, in addition, be accompanied by at least one complete unpriced copy of the contract the Applicant plans to accept for the purchase or construction of the systems. This information will be submitted within 30 days after receipt of the executed contract by the Applicant.

Should EPA, in its discretion, determine that the Applicant's final plans contain insufficient information to permit an independent evaluation of this system, it shall so notify the Applicant within 30 days after receiving the plans. The Applicant shall have 30 days thereafter to submit further design, engineering, and operating data. If, after reviewing these further data, EPA determines that there still is insufficient information or determines that the system will not enable the Applicant to meet and demonstrate compliance with the emission limits and conditions set forth in this permit, the EPA and the Applicant may meet within 60 days of this determination to discuss alternative control options. Pursuant to these discussions, EPA and the Applicant may determine a schedule for development and submittal of information on additional and/or modified control systems which will enable compliance with the emissions limits and conditions set forth in this permit. EPA shall review this additional information to determine whether the revised system will enable the Applicant to meet and demonstrate compliance with the emission limits and conditions set forth in this permit. If, after reviewing this further information, EPA determines that the additional and/or modified control system will not enable compliance with the emission limits and conditions set forth in this permit, then this permit to construct and operate may, upon notification of the Applicant, be denied <u>ab initio</u>. Failure by EPA to take such action shall not, however, constitute an endorsement of the methods chosen by the Applicant to reduce air emissions; nor shall such failure guarantee that these methods will, in fact, enable the Applicant to meet the condition of this permit. Any determination that the information submitted is insufficient or that the proposed control system will not enable compliance

shall be accompanied by a written statement of reasons, identifying the criteria applied and the factors considered. Onsite construction of any major equipment shall not commence before the control equipment design has been evaluated and approved by EPA.

(b) No coal shall be burned which is incompatible with the Applicant's control equipment design.

(6) At least 18 months prior to commencement of construction of unit 2, the Applicant shall submit sufficient information regarding the operation of that unit to allow for the determination of best available control technology for that unit. Construction of unit 2 shall not commence until BACT has been determined.

(7) The emission control equipment presented in the application for handling the coal, limestone, and ash shall be utilized, and the owner shall not cause to be discharged into the atmosphere fugitive emissions from any portion of the operation, excluding the outside coal storage pile, which exhibit 20 percent opacity or greater.

(8) This authority to construct and operate the Source does not relieve the Applicant of the obligation to comply with all other applicable federal, state or local regulations.

(9) The Applicant shall prepare an air quality monitoring plan that will determine the impact of Source emissions on air quality. The U. S. Environmental Protection Agency shall approve the site locations, instrumentation, duration of data collection, and determine if the plan should be implemented. All air quality monitoring must conform to the requirements of 40 CFR part 58. As part of the air quality monitoring program, a quality control program must be developed and implemented and consist of policies, procedures, specifications, standards and documentation necessary to:

(a) Meet the monitoring objectives and quality assurance requirements of the permit granting authority.

(b) Minimize loss of air quality data due to malfunctions or out-of-control conditions.

(10) Compliance provisions for conditions (1), (2), and (3) shall be in accordance with the appropriate sections in 40 CFR 60.46a.

(11) The owner or operator shall abide by all presentations, statements of intent, and agreements contained in the application and in all additions, modifications, and corrections thereto, as presented for public inspection.

IV. GENERAL

This permit is issued in reliance upon the accuracy and completeness of the information set forth in the Applicant's application to EPA for permission to commence construction. The conditions herein become, upon the effective date of this permit, enforceable by EPA pursuant to any remedies it now has, or may in the future have, under the Clean Air Act. Each and every condition shall become effective 30 days after the date of issuance unless a petition is made to the Administrator pursuant to 40 CFR 124.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII

BY: _____
Robert L. Duprey, Director
Air and Hazardous Materials Division

DATE: FEB 4 1981

APPENDIX I

NO.	DESCRIPTION	Date
1.	Permit application - unit 1	01-18-80
2.	State of Utah (B. Bradford) to EPA (N. Huey)	01-30-80
3.	State of Utah (B. Bradford) to Deseret (M. Millet)	02-07-80
4.	BLM (D. Vail) to EPA (N. Huey)	03-10-80
5.	EPA (N. Huey) to Forest Service	03-21-80
6.	BLM to EPA (N. Huey)	03-26-80
7.	Park Service (J. Thompson) to EPA (N. Huey)	03-27-80
8.	BLM (State Director) memo - April 3 meeting minutes	04-09-80
9.	Burns & McDonnell (M. Carney) to EPA (N. Huey)	05-02-80
10.	EPA (N. Huey) to Park Service (J. Thompson)	05-05-80
11.	EPA (D. Joseph) to Burns & McDonnell (M. Carney)	05-21-80
12.	BLM (M. Green) Memo	05-23-80
13.	Burns & McDonnell (C. Gaige) to EPA (N. Huey)	06-18-80
14.	BLM (G. Wicks) to EPA (R. Williams)	06-18-80
15.	Western Fuels Association - Report on Coal Quality	06-27-80
16.	Deseret (M Millett) to EPA (R. Williams) SO_2 removal	07-03-80
17.	Burns & McDonnell (M. Carney) to EPA (J. Dale)	07-07-80
18.	EPA (R. Williams) to BLM (G. Wicks)	07-21-80

NO.	DESCRIPTION	Date
19.	State of Utah (B. Bradford) to Deseret (M. Millett)	07-30-80
20.	Deseret (M. Millett) - Application for PSD permit for units 1 & 2	08-04-80
21	Ken Zishka (Utah) to Files	10-07-80
22.	Deseret (M. Millett) to State of Utah (B. Bradford)	10-08-80
23.	Deseret (M. Millett) to EPA (N. Huey)	11-03-80
24.	EPA (J. Notar) Memo	11-19-80
25.	EPA (E. Rachal) Application Analysis	11-20-80
26.	EPA (N. Huey) to National Park Service (S. Thompson)	11-20-80
27.	EPA (R. Duprey) to Deseret (M. Millett)	11-20-80
28.	Publication of public notice in The Vernal Express	11-27-80
29.	Burns & McDonnell (M. Carney) to EPA (R. Duprey)	12-09-80
30.	Deseret to EPA	12-10-80
31.	Transcript of Public Hearing	01-08-81
32.	National Park Service (L. Mintzmyer) to EPA (N. Huey) Comments.	01-09-81
33.	Deseret (M. Millett) to EPA (N. Huey)-Comments	01-09-81
34.	State of Utah (B. Bradford) to EPA (N. Huey)-Comments	01-09-81
35.	E.A. Rachal report to files on public hearing	01-20-81
36.	E. Rachal to J. Floyd re: Comments	01-22-81
37.	K. Tipton to E. Rachal	01-30-81
38.	EPA (J. Notar) to Burns & McDonald (M. Carney)	02--03-81
39.	EPA (E. Rachal) Application Analysis	02-04-81

APPENDIX II

Public Comments--Moon Lake

Walter Klinger-oral 1/8/81

1. EPA should track the status of increment comsumption.

   At the present time EPA has not established formal procedures for tracking the status of increment consumption. It is expected that the State air pollution control agencies will do so as they adopt PSD regulations and begin to implement the program. In this case, the conservative screening analysis shows that the increments will not be exceeded but does not show the actual fraction of increment consumed.

2. Monitoring data from Ua and Ub is invalid and should not be used.

   The Ua Ub meteorological data was used only to give an indication of the annual air quality impacts. The results showed that annual impacts were essentially insignificant. No other data was used.

Department of Interior-1/9/81

1. Legal requirements for minimum break between construction of units 1 and 2 unclear.

   The commentor is correct in his assertion. The legal requirement in 40 CFR 52.21 for phased construction projects is that construction of later phases begin within 18 months of the projected date. In this case, the application was amended on November, 3, 1980, to change the construction schedule for unit 2. As amended, the schedule for unit 2 is to commence construction in July 1986, and operation in July 1990.

2. Meteorological conditions used in the screening analysis were not specified in the permit application.

   The limiting analysis presented in the permit application was performed using F stability and 0.67 meters per second wind speed instead of the recommended 2.5 meters per second wind speed. To verify the company's conclusions EPA performed an analysis using

essentially the same input parameters except wind speed. Our results showed that changing the wind speed had little effect on the results and that the applicable standards and increments will still be maintained.

3. The analysis does not take into consideration the revised coal transportation system.

   The company amended its application on November 3, 1980, to indicate the revised coal transportation system. In that letter they correctly indicated that fugitive emissions from unloading the coal would be unchanged. Emissions during transit are considered to be negligible.

Utah Department of Health-1/6/81

1. EPA's emission estimates are incorrect.

   EPA's emission estimates are of potential emissions assuming that all permit conditions are met and both units operate at full capacity for the entire year. The estimates presented in the application analysis are correct.

2. The parameters used in EPA's modeling were not properly described.

   As indicated in the application analysis and its attachments, EPA's modeling effort used the same parameters except wind speed and stack height. EPA used the good engineering practice stack height of 562.5 feet instead of the actual height of 600 feet. Under F stability conditions, EPA used a wind speed of 2.5 meters per second instead of 0.67 meters per second which was used by the company.

3. EPA made conflicting statements regarding the acceptability of the company's modeling.

   There are no conflicting statements. The only deficiencies in the company's modeling were input wind speed and stack height as discussed above.

4. EPA did not consider the combined effects of Moon Lake and Geokinetics in evaluating increment consumption.

   It is true that both sources consume air quality increment, but not at the same time. Geokinetics must cease operating by June 1984, while Moon Lake will not begin operation until December 1984.

5. EPA's SO_2 emission limitation does not protect the Colorado Category I increment at Dinosuar National Monument.

   EPA has three emission limitations in its permit. One of these is a plant-wide limitation of 418 pounds per hour. Modeling shows that that limitation will protect the Colorado increment at Dinosaur.

6. EPA should have an opacity limitation for sources of fugitive emissions.

   The comment is correct and condition 7 of the permit has been amended to include an opacity limit.

Deseret G & T Coperative-1/9/81

1. The condition on SO_2 emissions of 0.10 pounds per million Btu heat input is unreasonable.

   The SO_2 portion of the proposed permit contained three emission limitations. One emission limitation is 418 pounds per hour and is based upon ambient air quality impacts. However, that limitation has two flaws. First and foremost, when the plant is operating below maximum capacity, that limit can be met without applying best available controls. Second, to simply scale that limit down for each unit (i.e. 209 lb/hr/unit) could require control beyond BACT during periods when such control is unnecessary. Therefore, two additional limits were added which are based upon BACT. The first requires 90% removal. The second, limits emissions to 0.10 pounds/MM Btu which also requires about 90% removal depending upon coal properties. Using average coal properties, the 90% removal requirement in condition III (1)(b) is most restrictive when only one unit is operating and will limit emissions to approximately 350 pounds per hour. However, when both units are operating the hourly limitation is most restrictive. Upon reanalysis of the conditions, it was decided that the 0.10 lbs/MM Btu is unnecessary and that limit has been deleted.

2. Emission rates reported in public notice and proposed permit were inconsistent.

   This is correct. The hourly emission rate for SO_2 will be rounded to the nearest pound. Thus rather than allowing 417.5 pounds per hour, the permit will allow 418 pounds per hour.

3. Stack test method for SO_2 incorrectly referenced.

   This is correct. The present reduction of SO_2 is to be calculated using method 19.

4. Discrepancy in potential emission rates based upon capacity.

   The application analysis listed "potential" emissions which must be based upon operating at maximum capacity.

5. The difference between the proposed stack height (600 feet) and the GEP stack height (562.5 feet) is negligible.

   This may be correct. However, since the GEP height is known, it should be used. EPA's analysis, which included the GEP height, confirmed that the difference had a negligible effect on predicted air quality impacts.

6. The permit should not require four stack test runs to demonstrate compliance with the particulate emission limitations.

   Four tests are necessary for two reasons. First, they are necessary for statistical significance, and second, they are needed to allow for soot blowing values.

7. The emission limitation for particulates should not be an eight hour average.

   This was not the intent, and condition (2)(a) has been changed to reflect this. The intent was that the limit must be met through "at least" eight hours of testing.

8. Clarify requirements to report opacity excesses over 12 minutes.

   The NSPS reporting requirement with regard to opacity excesses averaged over six minutes must be met. However, excesses over 12 minutes must be reported within 21 days of the occurrence.

9. On site data analysis should not be required.

   On site analysis requires no special equipment or personnel. The consultant normally has his own equipment and will continue the direct link by being responsible for the sample.

10. Performance specifications in Appendix III (3.20) are unreasonable.

    We agree that 5 % calibration error and 2.5% calibration and zero drift can be used and the appendix has been changed. However, precision and accuracy requirements must remain so the agency can evaluate the quality of all data used for enforcement.

11. Appendix III should not deviate from promulgated regulations.

    EPA has the responsibility under Part C to make case-by-case judgements which insure that best available controls are used. Since this case specific requirement does not alter 40 CFR Part 60 which applies to <u>all</u> new sources, the procedures of 307(d) need not be followed. Instead, as with all conditions in this permit, the specific requirements were subjected to public hearing and written comment. This procedure satisfies the requirements of Part C.

APPENDIX III

Continuous Emission Monitoring (CEM) Revision to 40 CFR Part 60 Subparts A and Da, and Appendix B for Direct Determination of Compliance Status with PSD Permits Applicable to Fossil Fuel-Fired Steam Generators

60.1 Expand to include:

(a) For purposes of this PSD permit, the existing provisions of 40 CFR Part 60, Subpart Da (FR Vol. 44, No. 113, pps. 33580 - 33624, June 11, 1979) are applicable, as well as all General Provisions under 40 CFR 60, and the provisions of 40 CFR, Part 60, appendix B, as amended, (FR Vol 40 No. 194, pps 46240 - 46271, October 6, 1975). Certain portions of these provisions are modified and applicable to the facility affected by this PSD permit. These modifications include: (1) deletions, (2) replacement, and (3) expansion of portions of the existing provisions of 40 CFR, Part 60, subparts A and Da, and appendix B.

60.7(a)(5) Delete "30" and insert "45".

60.7(c) Add at end, "unless otherwise approved or changed by the Administrator."

60.7(c)(1) Add at end: "The magnitude of all emissions and parameters as required as defined in 40 CFR 60, Subpart Da, shall be reported in a summary form by cause and range of magnitude above the applicable emission limitations of this permit, beginning at midnight, the first day of each calendar quarter, as given in Table II. A more detailed and comprehensive format for report of other information will be made available upon request. Range Z is to be used when systems have negative bias as demonstrated during any performance specification test under 60.13. Violations of any 30-day requirement will be listed for each day when the requirement was not met."

60.7(c) Expand to include:

(c)(5) The weekly average of seven daily zero and calibration drift values for each week of the quarter for each calibration point (zero and upscale) for each monitor required under Subpart Da, as computed according to paragraph 7.2.4, specification 2, of appendix B, part 60.

(c)(6) Date, time and initial calibration values of each required calibration adjustment made on any monitor unit during the quarter, including any time which the monitor was removed or otherwise inoperable for any reason, including reason why.

(c)(7) The date and results summary of each performance or other evaluation of any portion of the monitoring system during the quarter.

(c)(8) The percent (%) of on-line availability time by week for each modular unit (the total equipment necessary to determine the value of a single emission parameter, e.g. NO_x-ppm) under 60.13(e)(4), 60.47 a(f), and 60.49a and as required in the applicable subpart, as well as a description of down time under 60.7(c)(3) and table III.

(c)(9) All conversion values used to derive the 24-hour and/or 30-day emissions or percent reduction for SO_2 and NO_x, which include, but are not limited to: temperature and/or velocity or volumetric flow rate of stack gases, diluent, moisture, ppm, 10^6 Btu per hour (from heat rate curve), and megawatt production.

(c)(10) The production-weighted average daily (24 hour) emissions for SO_2 and NO_x for each boiler operating day of the quarter.

(c)(11) The production-weighted average percent reduction (SO_2 only) and emissions of SO_2 and NO_x for the 30 consecutive boiler-operating days prior to each day of the reporting quarter.

(c)(12) Other information as included in the format for the Excess Emission Report (EER), table I of this paragraph, as per instructions of Tab A. Additional format guidance is available upon request.

60.7(d) Expand to include after "inspection." in line 14: "The file shall also include a record of:

(1) The weekly (specify as received or as fired composites) average Btu per pound and average sulfur and ash content of coal expressed as pounds of sulfur (or ash) per million Btu, including assumptions for later pyrite rejection and bottom ash removal. Sampling and analysis shall be done in accordance with acceptable methods prescribed by ASTM.

(2) All conversion values used to derive the 24-hour and 30-day values for SO_2 and NO_x, which include, but are not limited to: temperature and/or velocity or volumetric flow rate of stack gases, diluent, moisture, ppm, 10^6 Btu per hour (from heat rate curve), and megawatt production."

60.7(e) Expand at end to include: "All excess emissions in Magnitude Ranges C (opacity only), D, and E shall be reported to the Administrator within twenty one (21) days according to the procedures of this section. Opacity excesses need not be included unless they had persisted for at least twelve (12) minutes."

60.7 Expand to include:

(f) When the system output in units of the standard is documented to have any negative bias during any series of test(s) done under 60.13, then all values equal to or greater than 80 percent of the applicable emission limitation of this permit shall be reported under 60.7(c)(1). This shall be done with a designation of "Range Z", as on table I. The reviewing agency will then take into account the document bias (negative and positive) of the system, and evaluate compliance accordingly.

(g) Quarterly reports should be submitted on magnetic tape and in a format approved by the Administrator to the maximum extent possible.

60.8(a) Delete entire paragraph and insert: "Within 180 days after achieving the maximum production rate at which the facility will be operated, but not later than 180 days after the first date which the facility supplies electrical power to the grid on a commercial basis, and at such other times as may be required by the Administrator under the Act, the owner or operator of such facility shall complete performance test(s), described in 60.46a, demonstrating compliance of the facility with the applicable emission limitations of this permit. A written report of the results of such performance test(s) shall be furnished to the Administrator within 60 days of the commencement of such test(s)."

60.8(b) Expand at end to include: "Continuous monitoring shall be used for compliance with SO_2 and NO_x emission limits, and may be used for compliance with opacity limits. At least four (4) runs, 2 hours each, shall be conducted for compliance with particulate limitations.

60.8(c) Delete from line 2: "under such" and insert "at or above 90 percent of maximum production, based on megawatt hours, or at other".

60.8(d) Delete "30" and insert "45." Expand at end to include: "For particulate tests, two (2) runs of the four (4) shall include at least one (1) hour of soot blowing of the air preheaters (unless continuous soot blowing is normally employed, and employed during each test. The average emission shall be calculated based on the proper ratio of normal operating time for the soot blowing and non-soot blowing."

60.8 Expand to include:

(e)(5) "For purposes of efficiently and expeditiously facilitating the tests, on-site analysis, results calculation, and preliminary reporting of SO_2 emissions during all certification or performance tests under 60.8(a) and 60.13(c) unless demonstrated 30 days in advance to be an unnecessary hardship. Previous history of procedures does not constitute hardship."

(g) Any reference method, manual-type test conducted under this section shall be used only to demonstrate emission levels during the actual period of the test.

60.11(a) Delete entire paragraph and insert: "(a) Compliance with particulate emission limits shall be performance tests under 60.8. Compliance with all SO_2 and NO_x emission limits shall be the continuous emission monitoring (CEM) system installed and certified under 60.13. Emission limits for opacity shall be continuously evaluated for compliance using CEM data. Compliance with percent reduction requirements for SO_2 may be based on combined data from CEM and fuel monitoring."

60.13(b) After "prior", delete "to conducting performance tests under 60.8.", and insert, "to the day which the facility achieves maximum production rate and the day which the facility operates on a commercial basis."

60.13(c) Delete, "or within 30 days thereafter." Also include in line 9 after "60 days thereof": "after the commencement of such evaluation unless otherwise approved by the Administrator."

(c)(1) Insert after "appendix B": "as revised herein for the purposes of this permit and at the production load as specified under 60.8(c)."

(c)(4) Expand at end to include: "Continuous emission monitoring systems listed within this paragraph shall be re-evaluated at least once during any 12 calendar months in accordance and demonstrate acceptability with the requirements and procedures for determination of zero and calibration drift (2-hour and 24-hour), accuracy error, and calibration error of measurements contained in the applicable performance specification of appendix B, as revised for this permit, or as prescribed by the Administrator. Reporting shall be according to 60.13(c)."

60.13(d) Delete from line 4, "check" and insert "shall determine the quantitative values for both".

(d)(1) Delete "as near the probe as is practical." and insert "at least at the root of the probe, unless otherwise approved by the Administrator."

Delete the entire second sentence beginning on line 6.

Delete the entire fourth and fifth sentences beginning on lines 14 and 20, beginning with "Every six. . ." and "The gases. . ." respectively, and insert in place: "Each span and zero gas cylinder or cell used in any monitoring system shall be initially analyzed not more than six (6) months prior to use in accordance with EPA Protocol Number One for certifying values in compressed gas cylinders. This protocol requires specific traceability to NBS Standard Reference Materials (SRM's) and is available from EPA upon request. The owner or operator shall supply to the Administrator within 21 days of the commencement of use of such cylinder(s) or cell(s), verification and certification using specific EPA protocol. The owner or operator of an affected facility shall provide the Administrator 30 days prior notice of such an analysis of replacement gas supplies to afford the Administrator the opportunity to have an observer present."

60.13(e) Expand at end to include:

(e)(4) Each monitor modular unit (i.e., each of the following system components as a unit: Opacity, SO_2, NO_x, diluent, and data handling units) of a continuous emission monitoring system as required under 60.13 and 60.47a shall attain a minimal annual (the four quarters of a calendar year) on-line availability time of 85 percent and a minimal quarterly availability time of 75 per-

cent for each individual quarter. Should any given yearly or quarterly availability time for any given monitor module unit(s) drop below these respective limits, the owner or operator shall, within 40 days (unless owner can demonstrate that late delivery was beyond his control) of the end of the first unexcused year or quarter in question, cause to be delivered to the facility site operable, factory tested and compatible monitor module(s) (entire component unit) able to replace the monitor module unit(s) which had unacceptable availability times, unless the owner or operator can document and excuse the unacceptable performance to the satisfaction of the Administrator, within thirty (30) calendar days of the end of such year or quarter, as provided for in 60.13(e)(4)(ii).

(e)(4)(i) The data reported under the provisions of 60.49 a(c) shall not be counted for purposes of showing compliance with (e)(4) above.

(e)(4)(ii) Documentation of such an excuse shall include at least one (1) of the following and shall be submitted in writing, including all supporting documents:

1. That the reason for the poor specific availability time had not caused another previous occurrence of unacceptable availability within the last two years, and the reason for the particular unavailability in question will be prevented in the future by a more effective maintenance/parts inventory program, or

2. That the entire system is once again fully operable and has been for at least 7 continuous days immediately prior to the report, and parts (as applicable) which had failed are in stock at the facility, or

3. The excused period of unacceptable availability is a period during which the provisions of 60.13(e)(4) were not met primarily because a component or modular unit of the monitoring system had malfunctioned, <u>and</u> this malfunction could <u>not have</u> reasonably been anticipated by the owner or operator to have occurred. An occurrence of a malfunction which could not have reasonably been anticipated to occur is a condition of improper operation of the component or modular unit which (in view of the past

experiences of either the vendor or the operator in operating such equipment of the specific type) had not occurred with enough frequency in the past, such that an operator in compliance with the provisions of 60.13(e)(4) of this paragraph could have taken the necessary steps (parts inventory, vendor delivery, and/or trained maintenance personnel, etc.) to be able to resolve such a malfunction condition and provide system availability times as provided for in 60.13(e)(4) above. A condition of improper operation for which the vendor normally, (a) stocks necessary repair parts, etc, (b) itemizes such necessary parts on any suggested parts inventory list for the user, or (c) suggests periodic preventive maintenance checks in order to check for such improper operation, will be a condition which could have been reasonably anticipated by the owner or operator, and therefore, will not be excused.

(e)(4)(iii) Availability time may be recalculated by the Administrator after excluding any unavailability period(s), excused under this section.

(e)(5) Within 30 days after the Administrator notifies the owner or operator (using reports subnmitted under 60.7) that two non-overlapping periods of unexcused, unacceptable system availability (yearly, quarterly, or combination) have occurred, and the provisions of 60.13(e)(4) have not been met, then the owner or operator shall install, calibrate, operate, maintain, and report emission data using the second compatible module unit(s) then on the facility site, delivered under 60.13(e)(4), unless the condition under 60.13(e)(4)(ii)(2) is documented by the owner or operator within 30 days of the end of the year or quarter to be applicable.

(e)(6) Within 60 days of the date of installation under Section 60.13(e)(5), the owner or operator of the affected facility shall complete a full performance evaluation of the entire continuous monitoring system for that pollutant under 60.13(c) as revised herein, showing acceptability of the system in question according to appendix B as revised for this permit, unless the module unit in question was the data handling unit alone. Within 30 days of the commencement of such evaluations tests, the owner or operator shall furnish to the Administrator a minimum of two copies of a complete

written report of such evaluation and test conducted above, demonstrating acceptability of the system according to 60.13 as amended herein. If the performance of any other module unit is affected by the unit in question, then these other unit(s) shall be reevaluated as well.

60.13(h) In the third sentence after ". . . opacity", insert the following "and fuel monitoring".

60.41a At the end, delete the definition of Boiler Operating Day. . . and insert after "period during which", the following: "the facility produced at least 50% of the maximum electrical power which is possible when operating at maximum production for 24 continuous hours."

60.43a(a) Expand to include: "(3)65 ng/J(0.150 lb/million Btu) heat input, based on the production-weighted average emissions of any 30 consecutive boiler operating days."

60.43a(g) Insert after "under" in line 3, "60.43a(a)(1) and (a)(2) of".

Insert at end: "Compliance with the emission limitation under 60.43a(a) of this section is determined by calculating the production-weighted average emissions for any averaging period from the individual hourly values, for each hour during which production was maintained.

60.46a(e) Insert after "60.43a", "(a)(1) and (a)(2)", and insert at end: "Compliance with all requirements under 60.43a shall be as provided for under 60.43a(a)(g)".

60.46a(f) Insert after "60.43a", "(a)(1) and (a)(2)".

In the third (last) sentence, delete "first" and insert "last"; also, delete "60" and insert "180"; and delete "initial startup of the facility." and insert: "the first date which the facility supplies electrical power to the electrical grid system on a commercial basis. On each of the 30 successive boiler operating days of the above performance tests, the facility shall demonstrate compliance with the limitations under 60.43a(a)(3)."

60.46a(g) Insert after "Compliance", "with the requirements of 60.43a(a)(1) and (a)(2)"; also delete, "arithmetic" and insert, "production-weighted," and insert at end: "Compliance with the limitations of 60.43a(a)(3) is based on the production-weighted average of all individual hourly values for a given calendar day, during which production was maintained."

60.46a Expand to include: "(i): The method of calculating the emission values for the requirements under 60.43a, and 60.44a and other applicable, provisions of this permit shall be the F-factor method, as related to production level (megawatts). The heat rate curve will be verified and may be revised by EPA in reviewing plant production and fuel records during the first 24 months of normal operation according to coal quality and production. Calculations are made using the individual values, properly weighting these values, relative to the production level at the time when the value was recorded."

60.47a(e) After "(b), (c)", insert "(j),".

Expand at end to include: "In addition, the availability requirements under 60.13(e)(4)-(6) will also be met."

60.47a(f) In the first sentence, line 5, delete "will" and insert, "may, for the purposes of meeting the availability requirements under 60.13(e)(4)-(6),". Also expand at end to include: ", or more data as necessary to meet the conditions of this permit."

Expand at end to include: "If this amount of data (55%) is not collected for each 30 successive boiler-operating days, using either the provisions of this paragraph or other methods acceptable to the Administrator, then the owner or operator shall not be considered in compliance with this section. The provisions of 60.13(e)(4) do not apply to these data requirements under 60.47a(f)."

60.47a(g) Expand at end to include: "The 1-hour averages used to calculate emission rates under 60.43a(a)(3) as specified in 60.46a(g) are expressed in pounds per million Btu heat input, which are then arithmetically averaged for each production hour for a specific day."

60.47a(h) Delete "will" and insert "may".

60.47a(i)(2) Insert after "nitrogen oxides": "or EPA Protocol Number One".

60.47a(i)(4) Delete "(b)" and insert "(i)".

60.47a(i)(5) Delete the remainder of the sentence following: " . . . the outlet of the sulfur dioxide control device is" and insert after: "device is," the following: "250 ppm, or as otherwise specified by the Administrator."

60.47a Expand at end to include:

(j): The owner or operator of an affected facility shall install, calibrate, maintain, and operate continuous monitoring systems, and record the output of the systems, for determining: 1) The total amount of electrical power (MWH) produced each hour of each day; 2) the approximate amount (not necessarily a measurement value) of moisture in the stack, if moisture is added to the system after the economizer; 3) the total volumetric flow rate of gas to the atmosphere. This may be related to the design (or EPA-verified) heat rate curve and the EPA F-factor and tied to the production monitor above, taking into account temperature, pressure, and excess air.

60.48a(a)(4) Delete: "(32°F)" and insert: "(320°F)".

60.49a(c) Insert in the first sentence after "60.47a", the following: "and 60.13(e)", and after " . . . 30 successive boiler operating days", the following: "or if the requirements of 60.13(e)(4)-(6) are not met solely by the CEM system,".

Performance Specification 2 -- SO_2 and NO_x Stack Monitors

3.1 Delete: "concentration", and insert in place: "emission in units of the standard."

3.1.3 Insert after "units," "or emissions in units of the standard."

3.3 Delete: "concentration" from lines 4 and 8, and insert "emission" in both places.

3.9 Insert after "wall" "as determined by Method 6 or 7 testing or as approved by the Administrator."

3.10 Conditioning Period. A minimum period of time, as noted in 60.13(b)(1), prior to the performance tests of 60.8 and 60.13(c) during which the entire continuous monitoring system shall be operated according to paragraph 6.2.1. of this specification."

3.10 Table 2-1 of paragraph 5 is revised to delete accuracy specification number 1 and include:

1.a. Combined Accuracy Error and Precision Error.....	± 20 pct (absolute value) the mean emission value of the reference method test data.

1.b.	Precision (confidence interval).....	_ 10 pct (absolute value) of the mean emission value from reference method test data."
2.	Calibration Error.....	5 pct (each 50 and 90 percent of span
4.	Zero Drift (24h)'...	2.5 pct of span.
5.	Calibration Drift (24h)'....	2.5 pct of span.

6.1 Delete the last sentence and insert: "This will be satisfactorily accomplished in the field during the operational test period, and prior to the relative accuracy tests under paragraph 6.2."

6.2.2.1 Expand at end to include: "During these tests, the facility shall operate at a minimum of 90 percent maximum load, according to 60.8(c)."

7.2.1 In lines 31-36, delete the sentence: "Accuracy is reported... mean reference method value.", and insert in place: "Accuracy error is reported as the absolute value of the mean of the arithmetic differences in emission values (in units of the standard) expressed as a percentage of the mean reference method value. Precision error is reported as the absolute value of the 95 percent confidence interval of the mean arithmetic differences in emission values (in units of the standard), expressed as a percentage of the mean reference method value."

Figure 2-3, "Accuracy (and precision errors) Determination", is revised herein, according to Figures 2-3(a) and 2-3(b).

7.2.8 Expand at end to include: "The entire continuous monitoring system shall perform and meet all specification of paragraph 5 within the required time limitations of 60.8(a), 60.12(c), and 60.13(e)(6)."

Deseret Generation & Transmission Cooperative, Inc. FEB 4 1981
Moon Lake Power Project
Two 400 MW Units
Bonanza, Utah

APPLICATION ANALYSIS

A. Applicability Determination

The proposed Moon Lake Power Project will consist of two coal-fired electrical power units that will generate 400 megawatts (design heat input 4,055 million Btu/hr) each for a total of 800 megawatts. Emissions will be from two main stacks, coal handling, and limestone handling.

Potential emissions from the proposed operations were estimated on the basis of calculations presented in the permit application and reflect operation at full capacity. These emissions are as follows:

Particulates

Operation	Uncontrolled tons/yr	Controlled tons/yr
Stacks	275,192	1,066
Coal conveying (plant site)	236	1
Coal crushing	100	1
Coal storage	4	2
Limestone handling	10	1
Total Particulates	275,542	1,071

Other pollutants are only emitted from the main stacks and are estimated as follows:

Pollutant	Uncontrolled tons/yr	Controlled tons/yr
SO_2	30,452	1,828
NO_x	30,452	21,313
CO	1,692	1,692
HC	17	17

The proposed Moon Lake plant is a major emitting facility for particulates, sulfur dioxide, nitrogen oxides, and carbon monoxide.

B. Applicaton Overview

The original permit application was submitted on January 18, 1980, and requested a permit to construct a single 400 megawatt unit. Later the company decided to obtain permits for two units to be constructed in phases. The permit application for both units was submitted on August 4, 1980, and was complete. The proposed plant is being reviewed in accordance with the transition provisions of the prevention of significant deterioration regulations as promulgated on August 7, 1980 (45 FR 52676).

On November 3, 1980, the company submitted additional materials changing the construction schedule. As amended, the schedule is as follows:

Spring 1981----Commence construction unit 1.
December 1984--Commence commercial operation unit 1.
July 1986------Commence construction unit 2.
July 1990------Commence commercial operation unit 2.

C. Control Technology Review

A control technology review must be performed for particulate matter, sulfur dioxide, nitrogen oxides, and carbon monoxide. The proposed emissions from the facility are equal to or below all applicable State or EPA emission limitations and, except for NO_x, the proposed control practices for unit 1 represent best available control technology (BACT). Because of the construction schedule, no control practices are proposed for unit 2. Instead, prior to construction of that unit, both the applicant and EPA will be required to reevaluate the required technology.

The specific technology proposed for unit 1 is discussed below.

Carbon monoxide

Process emissions of carbon monoxide are assumed to meet the BACT requirement because no control technology is available.

Sulfur dioxide

Because of air quality considerations, the applicant proposes an overall emission limitation of 417.5 pounds per hour. To meet this limit with both units operating would require emissions to be controlled by 94 percent (.05 lbs/MM Btu). The primary means for achieving this control is the use of a wet limestone SO_2 absorption system in which the flue gas is contacted with an alkali slurry of pulverized limestone. This system has been shown to achieve an efficiency of 95 percent and represents BACT.

Nitrogen oxides

The applicant proposes to achieve the new source performance standard (NSPS) for bituminous coal of 0.6 lbs/MM Btu. This limit does not represent BACT. The existing NSPS was established on the basis of tests on boilers using high sulfur (Eastern) bituminous coals in which severe slagging problems occurred when the boiler operations were modified to reduce NO_x emissions. However, tests on low sulfur bituminous coals have shown that a lower emission limit can be attained without causing such slagging problems. Thus, it is proposed that the BACT limit for Moon Lake be set at 0.55 lbs/MM Btu. This is discussed more fully in the record of the PSD permit for the Intermountain Power Project.

Particulate matter

The applicant proposes to meet the NSPS limit of 0.03 lb/MM Btu for stack emissions with the use of a fabric filter system which represents BACT.

Fugitive emissions from the coal handling system (including conveyors, silos, and bunkers) will be controlled by using enclosures and fabric filters. The dead storage pile will be controlled by wet suppressants.

Fugitive emission controls from the limestone handling system will consist of partial enclosure of the conveyors and fabric filters for the three silos. No control was proposed for the dead storage pile as wind erosion emissions were estimated to be insignificant (140 lbs per year).

Fly ash will be conveyed pneumatically to a silo where it will be mixed with scrubber sludge for disposal.

All roads will be paved except those leading to the raw water storage pond and evaporation and recycle ponds which are used infrequently.

All of the control systems for particulate matter represent BACT.

D. Stack Heights

The degree of emission limitation required for control of any air pollutant under the PSD regulations shall not be affected by a stack height which exceeds good engineering practice (GEP). Good engineering practice is defined by the height of a nearby structure plus one and a half times the lesser dimension (height or width) of the structure. In this case, since the height of the boilers is less than their combined width, GEP would be two and a half times the height (225') or 562.5 feet. The planned stack height is 600 feet and the air quality analysis was based upon a height of 600 feet. However, as discussed in the next section, EPA has performed an ambient analysis using a GEP stack.

E. Air Quality Review

EPA's regulations require an air quality review using a diffusion model specified in the "Guidelines on Air Quality Models" (OAQPS 1.2-080). This review must demonstrate that no PSD increment will be exceeded and that the national ambient air quality standards will be attained.

The applicant performed such a review and the results showed that the national ambient air quality standards and PSD increments would not be exceeded. However, there was some uncertainty regarding whether the estimates made by the company using "F" stability, 0.67 meters per second wind speed and 600 feet stack height would be as conservative as the strictly required "F" stability, 2.5 meters per second, and 562.5 feet. Thus, EPA performed a similar anlaysis using the screening assumptions and a GEP stack height. The results of that analysis and additional materials submitted by the company confirmed that neither NAAQS nor the PSD increments would be violated by operation of the proposed facility (See attachment 1).

F. Monitoring

The applicable preconstruction monitoring requirements are those contained in the regulations promulgated on June 18, 1978. In this case no preconstruction monitoring is necessary because:

1. No site-specific meteorological data is needed because the screening analysis shows that applicable standards and increments are not jeopardized; and

2. The proposed site is in a remote area and nearby ambient monitoring shows that present levels are extremely low.

A post-construction ambient monitoring plan for SO_2 and particulate matter to determine the impact of plant emissions on air quality should be required.

G. Additional Impact Analysis

Visibility

Information concerning the visibility impact near the proposed site is contained in a report entitled "Assessment of Visibility Impairment for Deseret Generation and Transmission Cooperative, Inc., Moon Lake Units 1 and 2."

EPA has reviewed this information and has concluded that visibility impacts will be minimal.

Soils and Vegetation

The application included discussions on the potential impact on soils and vegetation. The conclusion of those discussions was that any impacts would be undetectable.

General Growth

The application projects a total of 200 jobs as a result of the proposed project. The impacts of this growth should be negligible.

H. Public Participation

EPA proposed approval of the permit on November 20, 1980, and held a public hearing in Vernal, Utah, on January 8, 1981. One person commented at the public hearing and three people commented in writing. The hearing transcript, written comments and responses to the comments are attached to the permit as Appendix II.

E. A. Rachal
Technical Adviser

Attachments

11/3/80 Deseret letter
11/19/80 Notzer letter
2/3/81 " "

UNIT: TES ENVIRONMENTAL PROTECTION CY

NOV 20 1980

REF: 8AH-A

Mr. Merrill J. Millett, General Manager
Deseret Generation and Transmission Cooperative, Inc.
Box 3B
Sandy, Utah 84070

Dear Mr. Millett:

We have completed our preliminary review of your application to construct a coal fired electric generating plant (Moon Lake Project) at the proposed site north of Bonanza, Utah, pursuant to regulations, 40 CFR 52.21. We are proposing to issue a conditional permit for the facility. Enclosed is a copy of the public notice which will be published in newspapers in Grand Junction, Colorado, and Vernal, Utah.

Our regulations require that we provide the public with an oppportunity to submit written comments on the information in the permit application and on EPA's preliminary determination. Any written comments submitted before January 9, 1981, as well as pertinent statements received in the public hearing will be considered by EPA in making a final determination. The public hearing is scheduled to be held at 7:30 p.m. on January 8, 1981 at the Golden Age Center, 155 South 100 West, Vernal, Utah.

Enclosed for your review and comment is a copy of the proposed permit and our analysis of your application. If you have any questions, please contact Mr. E. A. Rachal of my staff at (303) 837-3711.

Sincerely yours,

Robert L. Duprey, Director
Air and Hazardous Materials Division

cc. Mr. James Lents
Mr. Brent Bradford

RACHAL:11/6/80:3711:2485B

Copy sent to Mark Grow — BLM

CONCURRENCES

SYMBOL	8AH						
SURNAME							
DATE	11/20/80						

EPA Form 1320-1 (12-70) OFFICIAL FILE COPY

UNI TES ENVIRONMENTAL PROTECTIO ICY

PROPOSED
CONDITIONAL PERMIT TO
COMMENCE CONSTRUCTION AND OPERATE

40 CFR 52.21
Significant Deterioration of Air Quality
Review of New Sources

Deseret Generation & Transmission Cooperative
Two 400 MW Units
Bonanza, Utah

I. INTRODUCTION

Deseret Generation & Transmission Cooperative (hereinafter "the Applicant") plans to construct two 400 megawatt coal-fired electric generating units (hereinafter "the Source") approximately 7 miles northwest of Bonanza in Uintah County, Utah.

On August 4, 1980, the Applicant requested from the U. S. Environmental Protection Agency, Region VIII (hereinafter "EPA"), permission to construct the Source at a location near Bonanza, Utah.

A partial listing of information considered by EPA in its review is contained in appendix I.

II. FINDINGS

On the basis of information in the administrative record (see appendix I for partial listing), EPA has determined that:

(1) The Applicant, through application of BACT as defined in 40 CFR, Section 52.21, will limit emissions from the units as set forth in III below;

(2) The following Class I areas are nearest the proposed site: Arches National Park, 88 miles south; Flat Tops Primitive Area, 89 miles east; and Mount Zirkel Wilderness Area, 131 miles northeast of the site.

(3) The Deseret Generation & Transmission Cooperative Unit will not cause exceedances of applicable air quality increments;

(4) Violations of the national ambient air quality standards will not be caused or exacerbated by the facility;

with changes noted

CONCURRENCES

SYMBOL		SCOTT	SPRC					
SURNAME		Henry	WM					
DATE		11/6/80	11/19/80					

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PROPOSED
CONDITIONAL PERMIT TO
COMMENCE CONSTRUCTION AND OPERATE

40 CFR 52.21
Significant Deterioration of Air Quality
Review of New Sources

Deseret Generation & Transmission Cooperative
Two 400 MW Units
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(3) The Deseret Generation & Transmission Cooperative Unit will not cause exceedances of applicable air quality increments;

(4) Violations of the national ambient air quality standards will not be caused or exacerbated by the facility;

(5) EPA has good reason to believe that the Applicant can comply with the conditions of this permit. However, in the issuance of this permit, EPA does not assume any risk of loss which may occur as a result of the commencement of construction and operation by the Applicant, if conditions of this permit are not met by the Applicant.

III. CONDITIONAL PERMIT TO CONSTRUCT AND OPERATE

On the basis of the findings set forth in II above, and pursuant to the authority (as delegated by the Administrator) in 40 CFR 52.21, EPA hereby grants conditional approval for the Deseret Generation & Transmission Cooperative to commence construction and operation of two 400 MW coal-fired electric generating units. This approval is expressly conditioned as follows:

(1) The plant shall not cause to be discharged into the atmosphere sulfur dioxide at a rate exceeding:

(a) 0.10 pounds per million Btu heat input as averaged over 30 successive boiler operating days from unit 1 (unit 2 emission limit to be established at a later date),

(b) 10 percent of the potential combustion concentration (90 percent reduction) as averaged over 30 successive boiler operating days from unit 1 (unit 2 emission limit to be established at a later date), and

(c) 418 pounds per hour as averaged over 30 successive boiler days from units 1 and 2 combined.

(d) Compliance with the emission limitations of this condition shall be based solely on data from the Continuous Emission Monitors (CEM) as provided for in condition 4 and appendix III of this permit. Compliance with the percent reduction requirements of (1)(b) may be based on a combination of CEM and fuel analysis data as provided for in 40 CFR 60, appendix A, method 1a. in place of CEM's at the inlet and outlet of the sulfur control device.

(2) Unit 1 shall not cause to be discharged into the atmosphere particulate matter at a rate exceeding (unit 2 emission limit to be established at a later date):

(a) 0.030 pounds per million Btu heat input, as averaged over 8 hours (minimum) of reference method testing, and

(b) Opacity of 20 percent, as averaged over each separate 6-minute period, except for one 6-minute period per hour of not more than 27 percent opacity.

(c) Compliance with part (a) of this condition shall be as provided for in 40 CFR 60, appendix A, method 5. Four (4) 2-hour runs shall be conducted as provided for in 60.8 of appendix III. Compliance with part (b) shall be as provided for in 40 CFR 60, appendix A, method 9 and data from CEM under condition (4) and appendix III of this permit.

(3) Unit 1 shall not cause to be discharged into the atmosphere nitrogen oxides, expressed as NO_2, at a rate exceeding 0.550 pounds per million Btu heat input based on a 30-day rolling average (unit 2 emission limit to be established at a later date). Compliance with this emission limit shall be based solely on CEM data as provided for in condition (4) and appendix III of this permit.

(4) A continuous monitoring system for measuring opacity, optical density, sulfur dioxide, nitrogen oxides, and diluent shall be installed, calibrated, maintained, and operated by the owner or operator. Procedures to be followed for (1) testing, monitoring, and reporting of excess emissions of particulates, opacity, sulfur dioxide, and nitrogen oxides, and for (2) the purposes of demonstrating compliance with the emission limitations of conditions (1), (2), and (3) are specified in the applicable sections of 40 CFR 60.7, 60.8, 60.11, 60.13, subpart Da, and Reference Methods Performance Specification Nos. 1, 2, and 3, of 40 CFR Part 60, appendices A and B, as is amended by appendix III of this permit, and which is incorporated as a part of this condition by reference. Production weighted values referred to in appendix III are not applicable to this permit.

A quality control program for the continuous monitoring system must be developed and implemented. As a minimum, the quality control program must have written procedures for each of the following activities:

(a) Installation of CEM's

(b) Calibration of CEM's

(c) Zero and calibration checks and adjustments for CEM's

(d) Preventive maintenance for CEM's (including parts inventory)

(e) Data recording and reporting

(f) Program of corrective action for inoperable CEM's

(g) Annual evaluation of CEM system

The quality control program must be described in detail, suitably documented, and approved by EPA Region VIII's Quality Assurance Office.

(5) (a) The Applicant shall submit to EPA all plans which relate to the design, engineering, and operation for the particulate, NO_x and SO_2 control systems. The information shall include, at a minimum, a description of the system's operation, major design parameters, and efficiency or emission rate quarantees. Such information should, in addition, be accompanied by at least one complete unpriced copy of the contract the Applicant plans to accept for the purchase or construction of the systems. This information will be submitted within 30 days after receipt of the executed contract by the Applicant.
Should EPA, in its discretion, determine that the Applicant's final plans contain insufficient information to permit an independent evaluation of this system, it shall so notify the Applicant within 30 days after receiving the plans. The Applicant shall have 30 days thereafter to submit further design, engineering, and operating data. If, after reviewing these further data, EPA determines that there still is insufficient information or determines that the system will not enable the Applicant to meet and demonstrate compliance with the emission limits and conditions set forth in this permit, the EPA and the Applicant may meet within 60 days of this determination to discuss alternative control options. Pursuant to these discussions, EPA and the Applicant may determine a schedule for development and submittal of information on additional and/or modified control systems which will enable compliance with the emissions limits and conditions set forth in this permit. EPA shall review this additional information to determine whether the revised system will enable the Applicant to meet and demonstrate compliance with the emission limits and conditions set forth in this permit. If, after reviewing this further information, EPA determines that the additional and/or modified control system will not enable compliance with the emission limits and conditions set forth in this permit, then this permit to construct and operate may, upon notification of the Applicant, be denied ab initio. Failure by EPA to take such action shall not, however, constitute an endorsement of the methods chosen by the Applicant to reduce air emissions; nor shall such failure guarantee that these methods will, in fact, enable the Applicant to meet the condition of this permit. Any determina-

tion that the information submitted is insufficient or that the proposed control system will not enable compliance shall be accompanied by a written statement of reasons, identifying the criteria applied and the factors considered. Onsite construction of any major equipment shall not commence before the control equipment design has been evaluated and approved by EPA.

(b) No coal shall be burned which is incompatible with the Applicant's control equipment design.

(6) At least 18 months prior to commencement of construction of unit 2, the Applicant shall submit sufficient information regarding the operation of that unit to allow for the determination of best available control technology for that unit. Construction of unit 2 shall not commence until BACT has been determined.

(7) The emission control equipment presented in the application for handling the coal, lime, and ash shall be utilized.

(8) This authority to construct and operate the Source does not relieve the Applicant of the obligation to comply with all other applicable federal, state or local regulations.

(9) The Applicant shall prepare an air quality monitoring plan that will determine the impact of Source emissions on air quality. The U. S. Environmental Protection Agency shall approve the site locations, instrumentation, duration of data collection, and determine if the plan should be implemented. All air quality monitoring must conform to the requirements of 40 CFR part 58. As part of the air quality monitoring program, a quality control program must be developed and implemented and consist of policies, procedures, specifications, standards and documentation necessary to:

(a) Meet the monitoring objectives and quality assurance requirements of the permit granting authority.

(b) Minimize loss of air quality data due to malfunctions or out-of-control conditions.

(10) Compliance provisions for conditions (1), (2), and (3) shall be in accordance with the appropriate sections in 40 CFR 60.46a.

(11) The owner or operator shall abide by all presentations, statements of intent, and agreements contained in the application and in all additions, modifications, and corrections thereto, as presented for public inspection.

IV. GENERAL

This permit is issued in reliance upon the accuracy and completeness of the information set forth in the Applicant's application to EPA for permission to commence construction. The conditions herein become, upon the effective date of this permit, enforceable by EPA pursuant to any remedies it now has, or may in the future have, under the Clean Air Act. Each and every condition is immediately effective unless within ten (10) days after receipt you notify this Regional Office in writing (Attention: Norman A. Huey, 8AH-A) that the permit or a term or condition thereof is rejected. Such notice should include the reason or reasons for rejection.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII

BY: D R A F T
Robert L. Duprey, Director
Air and Hazardous Materials Division

DATE: D R A F T

APPENDIX I

NO.	DESCRIPTION	Date

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12.	BLM (M. Green) Memo	05-23-80
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23.	EPA (E. Rachal) Application Analysis	11-20-80
24.	EPA (J. Notar) Memo	11-20-80

(5) EPA has good reason to believe that the Applicant can comply with the conditions of this permit. However, in the issuance of this permit, EPA does not assume any risk of loss which may occur as a result of the commencement of construction and operation by the Applicant, if conditions of this permit are not met by the Applicant.

III. CONDITIONAL PERMIT TO CONSTRUCT AND OPERATE

On the basis of the findings set forth in II above, and pursuant to the authority (as delegated by the Administrator) in 40 CFR 52.21, EPA hereby grants conditional approval for the Deseret Generation & Transmission Cooperative to commence construction and operation of two 400 MW coal-fired electric generating units. This approval is expressly conditioned as follows:

(1) The plant shall not cause to be discharged into the atmosphere sulfur dioxide at a rate exceeding:

(a) 0.10 pounds per million Btu heat input as averaged over 30 successive boiler operating days from unit 1 (unit 2 emission limit to be established at a later date),

(b) 10 percent of the potential combustion concentration (90 percent reduction) as averaged over 30 successive boiler operating days from unit 1, and

(c) 418 pounds per hour as averaged over 30 successive boiler days from units 1 and 2 combined.

(d) Compliance with the emission limitations of this condition shall be based solely on data from the Continuous Emission Monitors (CEM) as provided for in condition 4 and appendix III of this permit. Compliance with the percent reduction requirements of (1)(b) may be based on a combination of CEM and fuel analysis data as provided for in 40 CFR 60, appendix A, method 1a. in place of CEM's at the inlet and outlet of the sulfur control device.

(2) ~~The~~ unit~~s~~ 1 shall not cause to be discharged into the atmosphere particulate matter at a rate exceeding: (Unit 2 emission limits to be established at a later date)

(a) 0.030 pounds per million Btu heat input, as averaged over 8 hours (minimum) of reference method testing, and

(b) Opacity of 20 percent, as averaged over each separate 6-minute period, except for one 6-minute period per hour of not more than 27 percent opacity.

(c) Compliance with part (a) of this condition shall be as provided for in 40 CFR 60, appendix A, method 5. Four (4) 2-hour runs shall be conducted as provided for in 60.8 of appendix III. Compliance with part (b) shall be as provided for in 40 CFR 60, appendix A, method 9 and data from CEM under condition (4) and appendix III of this permit.

(3) ~~The~~ units 1 shall not cause to be discharged into the atmosphere nitrogen oxides, expressed as NO_2, at a rate exceeding 0.550 pounds per million Btu heat input based on a 30-day rolling average. Compliance with this emission limit shall be based solely on CEM data as provided for in condition (4) and appendix III of this permit. Units 2 . . . .

(4) A continuous monitoring system for measuring opacity, optical density, sulfur dioxide, nitrogen oxides, and diluent shall be installed, calibrated, maintained, and operated by the owner or operator. Procedures to be followed for (1) testing, monitoring, and reporting of excess emissions of particulates, opacity, sulfur dioxide, and nitrogen oxides, and for (2) the purposes of demonstrating compliance with the emission limitations of conditions (1), (2), and (3) are specified in the applicable sections of 40 CFR 60.7, 60.8, 60.11, 60.13, subpart Da, and Reference Methods Performance Specification Nos. 1, 2, and 3, of 40 CFR Part 60, appendices A and B, as is amended by appendix III of this permit, and which is incorporated as a part of this condition by reference. Production weighted values referred to in appendix III are not applicable to this permit.

A quality control program for the continuous monitoring system must be developed and implemented. As a minimum, the quality control program must have written procedures for each of the following activities:

(a) Installation of CEM's

(b) Calibration of CEM's

(c) Zero and calibration checks and adjustments for CEM's

(d) Preventive maintenance for CEM's (including parts inventory)

(e) Data recording and reporting

(f) Program of corrective action for inoperable CEM's

(g) Annual evaluation of CEM system

The quality control program must be described in detail, suitably documented, and approved by EPA Region VIII's Quality Assurance Office.

(5) (a) The Applicant shall submit to EPA all plans which relate to the design, engineering, and operation for the ~~unit 1~~ particulate, NO_x and SO_2 control systems. The information shall include, at a minimum, a description of the system's operation, major design parameters, and efficiency or emission rate guarantees. Such information should, in addition, be accompanied by at least one complete unpriced copy of the contract the Applicant plans to accept for the purchase or construction of the systems. This information will be submitted within 30 days after receipt of the executed contract by the Applicant. Should EPA, in its discretion, determine that the Applicant's final plans contain insufficient information to permit an independent evaluation of this system, it shall so notify the Applicant within 30 days after receiving the plans. The Applicant shall have 30 days thereafter to submit further design, engineering, and operating data. If, after reviewing these further data, EPA determines that there still is insufficient information or determines that the system will not enable the Applicant to meet and demonstrate compliance with the emission limits and conditions set forth in this permit, the EPA and the Applicant may meet within 60 days of this determination to discuss alternative control options. Pursuant to these discussions, EPA and the Applicant may determine a schedule for development and submittal of information on additional and/or modified control systems which will enable compliance with the emissions limits and conditions set forth in this permit. EPA shall review this additional information to determine whether the revised system will enable the Applicant to meet and demonstrate compliance with the emission limits and conditions set forth in this permit. If, after reviewing this further information, EPA determines that the additional and/or modified control system will not enable compliance with the emission limits and conditions set forth in this permit, then this permit to construct and operate may, upon notification of the Applicant, be denied ab initio. Failure by EPA to take such action shall not, however, constitute an endorsement of the methods chosen by the Applicant to reduce air emissions; nor shall such failure guarantee that these methods will, in fact, enable the Applicant to meet the condition of this permit. Any determination that the information submitted is insufficient or that the proposed control system will not enable compliance shall be accompanied by a written statement of reasons, identifying the criteria applied and the factors considered. Onsite construction of any major equipment shall not commence before the control equipment design has been evaluated and approved by EPA.

(b) No coal shall be burned which is incompatible with the Applicant's control equipment design.

(6) At least 18 months prior to commencement of construction of unit 2, the Applicant shall submit sufficient information regarding the operation of that unit to allow for the determination of best available control technology for that unit. Construction of unit 2 shall not commence until BACT has been determined.

(7) The emission control equipment presented in the application for handling the coal, lime, and ash shall be utilized.

(8) This authority to construct and operate the Source does not relieve the Applicant of the obligation to comply with all other applicable federal, state or local regulations.

(9) The Applicant shall prepare an air quality monitoring plan that will determine the impact of Source emissions on air quality. The U. S. Environmental Protection Agency shall approve the site locations, instrumentation, duration of data collection, and determine if the plan should be implemented. All air quality monitoring must conform to the requirements of 40 CFR part 58. As part of the air quality monitoring program, a quality control program must be developed and implemented and consist of policies, procedures, specifications, standards and documentation necessary to:

(a) Meet the monitoring objectives and quality assurance requirements of the permit granting authority.

(b) Minimize loss of air quality data due to malfunctions or out-of-control conditions.

(10) Compliance provisions for conditions (1), (2), and (3) shall be in accordance with the appropriate sections in 40 CFR 60.46a.

(11) The owner or operator shall abide by all presentations, statements of intent, and agreements contained in the application and in all additions, modifications, and corrections thereto, as presented for public inspection.

IV. GENERAL

This permit is issued in reliance upon the accuracy and completeness of the information set forth in the Applicant's application to EPA for permission to commence construction. The conditions herein become, upon the effective date of this permit, enforceable by EPA pursuant to any remedies it now has, or may in the future have, under the Clean Air Act. Each and every condition is immediately effective unless within ten (10) days after receipt you notify this Regional Office in writing (Attention: Norman A. Huey, 8AH-A) that the permit or a term or condition thereof is rejected. Such notice should include the reason or reasons for rejection.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII

BY: D R A F T
Robert L. Duprey, Director
Air and Hazardous Materials Division

DATE: D R A F T

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24.	EPA (E. Rachal) Application Analysis	11-20-80

FEB 28 1980

REF: 8AH-A

Ms. Ruby Black
Chairperson
Tribal Business Council
Ute Tribe
Fort Duchesne, Utah 84026

Dear Ms. Black:

You are notified hereby that this office has received an application for permit to construct a source of air contaminant emissions of such nature and in such location as possibly to affect air quality values at and in the Unitah and Ouray Indian Reservation.

The applicant, Deseret Generation and Transmission Cooperative, Incorporated, proposes to construct a coal-fired steam-electric generating plant to be known as Moonlake Unit No. 1 some 7 miles northwest of Bonanza, Utah.

As soon as this Agency's preliminary determination has been completed, a copy will be sent to you together with the public announcement required under Section (r) of the PSD regulation (40 CFR 52.21).

Sincerely yours,

Norman A. Huey, Chief
Technical Support Section

8AH-A:LONGENBERGER:ksb:6249A:3753:2-26-80

8AH-A
Dale
2/26/80

2-26-80

FEB 28 1980

REF: 8AH-A

Mr. Dan Baker
State Director, Bureau of Land Management
2515 Warren Avenue
P. O. Box 1828
Cheyenne, Wyoming 82001

Dear Mr. Baker:

You are notified hereby that this office has received an application for permit to construct a source of air contaminant emissions of such nature and in such location as possibly to affect air quality values at and in Flaming Gorge National Recreation Area.

The applicant, Deseret Generation and Transmission Cooperative, Incorporated, proposes to construct a coal-fired steam-electric generating plant to be known as Moonlake Unit No. 1 some 7 miles northwest of Bonanza, Utah.

As soon as this Agency's preliminary determination has been completed, a copy will be sent to you together with the public announcement required under Section (r) of the PSD regulation (40 CFR 52.21).

Sincerely yours,

Norman A. Huey, Chief
Technical Support Section

8AH-A:LONGENBERGER:ksb:6247A:3763:2-26-80

8AH-A
Dole
2/26/80

2-26-80

FEB 28 1980

REF: 8AH-A

Mr. Dale Andrus
Colorado State Director
Bureau of Land Management
Room 707, Colorado State Bank Building
Denver, Colorado 80203

Dear Mr. Andrus:

You are notified hereby that this office has received an application for permit to construct a source of air contaminant emissions of such nature and in such location as possibly to affect air quality values at and in Dinosaur National Monument.

The applicant, Deseret Generation and Transmission Cooperative, Incorporated, proposes to construct a coal-fired steam-electric generating plant to be known as Moonlake Unit No. 1 some 7 miles northwest of Bonanza, Utah.

As soon as this Agency's preliminary determination has been completed, a copy will be sent to you together with the public announcement required under Section (r) of the PSD regulation (40 CFR 52.21).

Sincerely yours,

Norman A. Huey, Chief
Technical Support Section

8AH-A:LONGENBERGER:ksb:6246A:3763:2-26-80

8AH-A
Dale
2/26/80

FHL
2-26-80

FEB 28 1980

REF: 8AH-A

Mr. Paul Howard
State Director, Bureau of Land Management
University Club Building
136 East South Temple
Salt Lake City, Utah 84111

Dear Mr. Howard:

You are notified hereby that this office has received an application for permit to construct a source of air contaminant emissions of such nature and in such location as possibly to affect air quality values at and in Ashley National Forest, Flaming Gorge National Recreation Area, Dinosaur National Monument, and Unitah and Ouray Indian Reservation.

The applicant, Deseret Generation and Transmission Cooperative, Incorporated, proposes to construct a coal-fired steam-electric generating plant to be known as Moonlake Unit No. 1 some 7 miles northwest of Bonanza, Utah.

As soon as this Agency's preliminary determination has been completed, a copy will be sent to you together with the public announcement required under Section (r) of the PSD regulation (40 CFR 52.21).

Sincerely yours,

Norman A. Huey, Chief
Technical Support Section

8AH-A:LONGENBERGER:ksb:6241A:3763:2-26-80

FL 2-26-80

8AH-A
Dale
2/26/80

FEB 28 1980

REF: 8AH-A

L. W. Collier, President
Unitah and Ouray Agency
Bureau of Indian Affairs
U. S. Department of the Interior
Fort Duchesne, Utah 84026

Dear Mr. Collier:

You are notified hereby that this office has received an application for permit to construct a source of air contaminant emissions of such nature and in such location as possibly to affect air quality values at and in Unitah and Ouray Indian Reservation.

The applicant, Deseret Generation and Transmission Cooperative, Incorporated, proposes to construct a coal-fired steam-electric generating plant to be known as Moonlake Unit No. 1 some 7 miles northwest of Bonanza, Utah.

As soon as this Agency's preliminary determination has been completed, a copy will be sent to you together with the public announcement required under Section (r) of the PSD regulation (40 CFR 52.21).

Sincerely yours,

Norman A. Huey, Chief
Technical Support Section

8AH-A:LONGENBERGER:ksb:6250A:3763:2-26-80

8AH-A
2/26/80

2/26/80

FL
2-26-80

FEB 28 1980

REF: 8AH-A

Manager, Denver Service Center
United States National Park Service
755 Parfet Street
Denver, Colorado 80225

Dear Sir:

You are notified hereby that this office has received an application for permit to construct a source of air contaminant emissions of such nature and in such location as possibly to affect air quality values at and in Dinosaur National Monument.

The applicant, Deseret Generation and Transmission Cooperative, Incorporated, proposes to construct a coal-fired steam-electric generating plant to be known as Moonlake Unit No. 1 some 7 miles northwest of Bonanza, Utah.

As soon as this Agency's preliminary determination has been completed, a copy will be sent to you together with the public announcement required under Section (r) of the PSD regulation (40 CFR 52.21).

Sincerely yours,

Norman A. Huey, Chief
Technical Support Section

8AH-A:LONGENBERGER:ksb:6240A:3763:2-26-80

8AH-A
Dale
2/26/80

FL
2-26-80

FEB 28 1980

REF: 8AH-A

Regional Forester
U. S. Forest Service, Region IV
Federal Building
324 25th Street
Ogden, Utah 84401

Dear Sir:

You are notified hereby that this office has received an application for permit to construct a source of air contaminant emissions of such nature and in such location as possibly to affect air quality values at and in Ashley National Forest and Flaming Gorge National Recreation Area.

The applicant, Deseret Generation and Transmission Cooperative, Incorporated, proposes to construct a coal-fired steam-electric generating plant to be known as Moonlake Unit No. 1 some 7 miles northwest of Bonanza, Utah.

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Sincerely yours,

Norman A. Huey, Chief
Technical Support Section

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8AH-A
Dale
2/20/80

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2-26-80