

EPA REGION 8'S RESPONSE TO PETITION FOR REVIEW

Attachment N

Administrative Record Document No. 16

Proposed Clarifications to Draft Deseret Bonanza Title V Permit Posted to Regulations.gov by
Deseret Power (EPA-R08-OAR-2019-0350-0013-attachment 1)

SECTION	PROPOSED CHANGE
I.A (Page 2)	Paragraph 1, 9 th sentence; ...The unit at full load <u>bums</u> ... should be burns.
I.A (Page 3)	Change paragraph title “Low-NOx Burners” to “Low-NOx Burners and Over Fire Air (LNB/OFA)”. Propose changing the paragraph to the following: “In 2016, new Low-NOx burners and an Over-Fire Air combustion control system was installed on the main boiler to reduce NOx emissions. The LNB/OFA system was designed by DTE Energy’s Power & Industrial Group.”
I.B (Page 4)	Would LNB/OFA be considered control equipment for Emission unit 1-1? If so, add to table.
I.B Table 2 (Page 5)	<u>2</u> Fly Ash Silos – should be 1 Fly Ash Silo
I.B Table 2 (Page 5)	3 Coal Conveyors 1,2, & 8: Control Equipment should be ‘As Required in Permit Section XII’
III.D.5.b (Page 15)	Text error: ...for each successive 1 5-minute period... should be <u>15</u> -minute period.
IV.B.1.c	We believe this sentence should end with or (like the original) and not and
V.D (Page 42)	Section 63.10031 has recently been significantly revised. Suggest replacing all subsection text to reflect changes in current CFR.
VIII.A.1 (Page 48)	referenced section is (ii) should be 2.
VIII.A.7.a.ii (Page 49)	no period after ...shall be no less
VIII.A.7.b.vii (Page 51)	space above and below paragraph
X. (Page 54)	referenced section is II.A.8 should be X.
XI.F.1.a (Page 64)	referenced section is 9(a)(ii) should be XI.A.2
XI.F.1.b.ii (Page 65)	referenced section is 9(a)(iv) should be XI.A.4
XI.F.4 (Page 65)	referenced section is 9(f) should be XI.F
XIII.G.1.d	Reference to recordkeeping requirement 40 CFR 82.166(i) is invalid since this section does not exist. Should be referencing 40 CFR 82.156(3) for appliances and 82.42(b) for MVACs and MVAC-like appliances?
Attach 1	Draft omitted original sections 2 and 3. In the context of the permit these sections are repetitive; however they are part of the current Fugitive Dust Control Plant (FDCP); Does EPA want the Permittee to update and resubmit the plan without these sections or keep these sections in the attachment so they are harmonious with the submitted plan?