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Manager

Submitted electronically via www.regulations.gov

March 2, 2016

Mr. Larry Maurin
(AIR-3)
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105-3901

RE: *Comments on Proposed Minor NSR Permit for SRP Navajo Generating Station*
Docket ID No. EPA-R09-OAR-2016-0026

Dear Mr. Maurin,

The Salt River Project Agricultural Improvement and Power District (SRP) appreciates the opportunity to provide the following comments to the U.S. Environmental Protection Agency (EPA) regarding the proposed Minor New Source Review (NSR) Permit for the addition of a refined coal treatment system at the Navajo Generation Station (NGS).

Permit Condition X.A.4.

Proposed Permit Condition X.A.4. states the following:

"The dust on the site roadways shall be controlled by applications of water such that visible fugitive dust emissions do not exceed 20 percent opacity. Roadways shall be swept as needed between applications of water."

Under this proposed language, SRP is limited to road watering and sweeping to control fugitive dust on site roadways. In addition, most of the roadways subject to this condition are unpaved, making sweeping an impractical control measure. SRP recommends a revision to the draft permit language to provide additional flexibility in the measures that may be used to control dust on the roadways used to transport treatment chemicals:

"The dust on the site roadways shall be controlled by the application of water, dust suppressants, or an alternative control measure such that visible dust emissions do not exceed 20 percent opacity."

Permit Condition X.B.4.

Permit Condition X.B.4. requires weekly visible emission surveys of the various emission sources associated with the refined coal system and the powder activated carbon (PAC) system. In the event that visible emissions are detected, Permit Condition X.B.4. further requires corrective action to be taken within 24 hours. This permit condition, as proposed, implies that the listed emission sources have an opacity limit of zero. A zero percent opacity limit is impractical and is more stringent than the EPA's New Source Performance Standards (NSPS) for similar sources¹.

The current Title V operating permit for NGS requires dust emissions from similar coal handling sources to be maintained below 20 percent opacity as determined by a certified EPA Reference Method 9 observer². SRP recommends a similar condition be included for the refined coal and PAC systems. Specifically, the following language is recommended for Permit Condition X.B.4.:

"A certified EPA Reference Method 9 observer shall conduct a weekly visible emission observation for the PAC Silos (Silos A and B), Dust Collectors DC-12 and DC-13, Cement Kiln Dust Storage Silos (DC-14 through DC-16), and Cement Kiln Dust Day Bins (DC-17 and DC-18) while the equipment is operating, and during daylight hours. If visible emissions are present at any of the equipment, a 6-minute EPA Reference Method 9 observation shall be conducted. If visible emissions greater than 20 percent opacity are detected during the Method 9 observation, the Permittee shall take corrective action within 24 hours."

SRP appreciates your consideration of the above comments on the proposed Minor NSR Permit for the refined coal treatment system at NGS. If you have questions or need additional information regarding these comments, please contact Kyle Heckel at (602) 236-5493 or Kyle.Heckel@srpnet.com, or me at (928) 645-6217 or Joe.Frazier@srpnet.com.

Sincerely,



Kenneth Joe Frazier
Manager, Navajo Generating Station

¹ See NSPS Subpart Y for Coal Processing and Preparation Plants and NSPS Subpart OOO for Nonmetallic Mineral Processing Plants

² Permit No. NN-ROP-05-06 issued by the Navajo Nation Environmental Protection Agency