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Navajo Generating Station - Refined Coal Treatment System - Clean Air Act Minor New Source Review Permit

Comment On: EPA-R09-OAR-2016-0026-0001

NGS Proposed Permit Feb 2016

Document: EPA-R09-OAR-2016-0026-0009

Comment on EPA-R09-OAR-2016-0026-0001

Submitter Information

General Comment

III Facility Operation should be amended to support the review of imagery associated with opacity observations performed in support of all opacity limits with the permit and facility.

X-A.4 and 5 should be changed to include the use of EPA Alternative Method 082 (Digital Camera Opacity Technique (DCOT)) for the monitoring of visible emission.

A-B.4 and 5 and 8 should be changed to include the use of EPA Alternative Method 082 (Digital Camera Opacity Technique (DCOT)) for the monitoring of visible emission.

Rational:

EPA Alternative Method 082 has been determined in the Ferro Alloy NESHAP final rule as BACT for opacity measurement, this is a BACT driven permit and thus should include BACT for all monitoring requirements unless BACT is cost prohibitive. Given the cost to maintain Method 9 certification in Page Arizona the use of EPA Alternative Method 082 would be less expensive, more reliable and repeatable than Method 9. Further, imagery from camera used to perform EPA Alternative Method 082 opacity observations could be posted to public web sites for community relations improvement.

Experience: Being a native of Arizona I have spent a great amount of time boating on Lake Powell. I have notice coal dust, road dust, and excessive emission from the NGS facility. Given that camera based technology exists, is certified as BACT for opacity, and is cost effective, I do not believe any permit should be promulgated with out its requirement. Methods, 22 and 9 are very subjective legacy methods and COMS are not representative of the exit opacity values. I have personal witnessed secondary formations from NGS that significantly exceed the stack exit opacity (measured beyond the condensed water vapor). I have witnessed coal dust emissions at opacities greater than 60% hundreds of feet in the air and at water level in the lake Powell main channel just north of Antelope Point marina.

