



Pacific Power |
Rocky Mountain Power
1407 West North Temple
Salt Lake City, Utah 84116

November 29, 2018

submitted electronically by email to: thomasgunter@utah.gov

Mr. Bryce C. Bird
c/o Thomas Gunter
Utah Division of Air Quality
P.O. Box 144820
Salt Lake City, Utah 84114

RE: Comments on Amendments to Utah State Implementation Plan: Revision to Section IX, Part H, Emission Limits and Operating Practices.

Dear Mr. Bird:

PacifiCorp appreciates the opportunity to comment on the above proposed State Implementation Plan ("SIP") amendment by the Utah Division of Air Quality ("UDAQ").

UDAQ is proposing rule changes that would affect Unit #3 at PacifiCorp's Gadsby Power Plant. Specifically, the proposed SIP amendment would eliminate Unit #3's nitrogen oxides (NOx) summertime emission limit (203 lbs/hr on a three hour block average basis), which is currently applicable between March 1 and October 31. The rule would also make Gadsby Unit 3's current wintertime NOx limit (142 lb/hour on a three hour block average basis) a year-round limit, thereby restricting the Unit's summertime operating flexibility.

Gadsby Power Plant Unit 3 is required to be dispatched at varying generation levels to support customer load requirements – most often during the summer when peak loads are highest. Curtailment during these times imposes constraints that are detrimental to PacifiCorp's ability to meet the load requirements of its customers.

UDAQ's proposal appears to be the result of an effort to 'provide consistency' across emission sources regulated under Part H by simply eliminating seasonal limits. However, the proposal is also a shift from a previous position recently¹ taken by UDAQ, where UDAQ properly justified Gadsby's seasonal limits. Specifically, in response to Comment 33 on UDAQ's original proposed amendment to Section IX, Part H of the SIP, UDEQ explained that it was not arbitrary

¹ See Utah Air Quality Board Memo; PROPOSE FOR PUBLIC COMMENT: Amend SIP Subsection IX. Part H: Emission Limits and Operating Practices. Specifically Proposed for Amendment are Requirements in Subparts H. 1, 2, 11, and 12; Attachment B; October 3, 2018.

to allow Gadsby to have seasonal controls while a prohibition was enforced on another emitter's coal-burning unit in the same non-attainment area. The prohibition disallowed the burning of coal as a fuel during wintertime inversions.

UDAQ explained that it was not arbitrary to allow seasonal limits in one instance, but not another, because while Gadsby Unit 3 had seasonal controls, it also has limits that apply year-round, and that those limits were considered BACT. UDAQ also explained that the BACT analysis for Gadsby was based on actual emissions, and it was determined that the installation of additional controls was not economically feasible. Because no additional control measures were identified during the BACT review for Gadsby, UDAQ properly maintained the Title V permit limits, which included the seasonal limits. Furthermore, UDAQ specifically noted that Gadsby's seasonal limits only apply to the lb/hr limit, and that Gadsby's concentration-based NOx limits do not change on a seasonal basis. In its analysis, UDAQ took a case-specific approach to determining the appropriateness of allowing Gadsby's seasonal limits.

PacifiCorp strongly disagrees with UDAQ's recent arbitrary shift to unilaterally eliminate summertime limits for Gadsby Unit #3 without any reasonable justification. While meeting the summertime load requirements of customers, Gadsby Unit #3 has historically had NOx emissions that are within the summertime limits, but would be in excess of wintertime limits. Thus, elimination of the summertime limit entirely is problematic for serving customers while maintaining regulatory compliance.

PacifiCorp therefore respectfully requests that UDAQ continue to allow for additional operational flexibility during the summer by maintaining the current summertime NOx limit between March 1 and October 31. If UDAQ wishes to adjust or decrease Gadsby Unit #3's current summertime limit, PacifiCorp welcomes discussion and collaboration in determining proper adjustments, if any.

PacifiCorp appreciates the opportunity to comment on this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "James C. Owen".

James C. Owen
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