

July 17, 2023

Mr. Bryce Bird – Director
Utah Division of Air Quality
195 N. 1950 West
Salt Lake City, Utah 84114-4820

Submitted via email to Erica Pryor at epryor1@utah.gov

Attention: Ryan Bares

Re: Kennecott Utah Copper LLC's Comments on the Notice of Proposed Rule, Subsection IX.D.11: 2015 Ozone NAAQS Northern Wasatch Front Moderate Nonattainment Area

Mr. Bryce Bird,

Kennecott Utah Copper LLC (Kennecott) submits the following comments on the April 5, 2023 proposed rulemaking Section R307-110-13, amendments to Utah State Implementation Plan, adding Subsection IX.D.11 (SIP) and the technical support documentation (TSD) for the same, posted on the Utah Division of Air Quality's (UDAQ) website.

Kennecott appreciates the opportunity to comment on the proposed SIP and supporting TSD. The comments outlined below are intended to identify items for correction and request additional detail be incorporated into the SIP and TSD.

Comments on the SIP:

- a) Table 33 (Section 4.8.4, Page 57) references that blasting activities at the BCM were not conducted during the evaluation period. This is an incorrect statement. This SIP only includes NO_x and VOC emission sources. Kennecott requests that Blasting activities be removed from Table 33 as this activity is not a source of NO_x or VOCs. Blasting activities were not included in the Reasonably Available Control Technology (RACT) analyses submitted in February 2023 to UDAQ as it was intended to focus on NO_x and VOC emission sources.
- b) Table 35 (Section 4.9.4, Page 60) references that the Refinery has two boilers. In compliance with the requirements in AO DAQE-AN103460058-20, Tankhouse Boiler # 1 (REF 003) was decommissioned. Kennecott requests that this RACT

determination language in Table 35 for NO_x be updated to state “ULNB (9 ppmvd) on the boiler and continued use of FGR,” and the reference to two boilers be corrected.

- c) Table 35 (Section 4.9.4, Page 60) references that the Refinery CHP (REF CHP) uses a ULNB (9ppmvd) on the duct burner. This is an incorrect statement. Equipped with SoLoNO_x burners, emissions from the turbine are limited to 9ppm for NO_x. Kennecott requests the RACT determination language in Table 35 be revised to state “Use of SoloNO_x burner technology (9 ppmvd) on turbine.”
- d) Table 64 (Section 7.3, Page 111) and Table 65 (Section 7.4, Page 113) include the baseline and projected VOC and NO_x emissions, for the Emission Reduction Credits (ERC) bank. However, additional detail to review the ERC totals was not located in the TSD documentation. Kennecott requests that UDAQ update the TSD documentation to include a summary of the ERCs (referenced on Table 64 and Table 65) and how the tons per day totals were calculated.
- e) UDAQ states that ozone source apportionment (OSAT) modeling was used to determine the contribution of different source emission groups and regions to measured ozone concentrations at various monitoring sites within the non-attainment area (NAA). UDAQ provides a list of source emission groups in Table 73 of the SIP document, however, UDAQ does not provide details into how these source emission groups were selected. Kennecott requests that specific details about the OSAT categories be incorporated into the TSD and include information about how inventory sources were allocated to the categories.
- f) In “Section 8.3.5.10 Emission Reductions Beyond the NAA Boundary” on Page 138, UDAQ summarizes items from Utah’s Second Implementation Period for Regional Haze. Kennecott’s Utah Power Plant facility was not included in the regional haze analysis. Kennecott voluntarily decommissioned the power plant boilers as documented in Approval Order DAQE-AN105720040-20. Kennecott requests that “(5) highlighted permit modifications associated with the decommissioning of the Kennecott power plant and lab tailings impoundment” be removed from the document.

Additionally, the Utah Air Quality Board is requesting public comment on the following specific items:

- 1) The appropriateness of cost thresholds for Reasonably Available Control Measures (RACM) and Reasonably Available Control Technology (RACT).
 - a. Kennecott believes that UDAQ should manage the RACT/RACM process following EPA guidelines and in a manner that is consistent with other jurisdictions, just as UDAQ has implemented RACT/RACM in previous SIP planning for PM₁₀ and PM_{2.5}.

- 2) Whether NO_x controls should be required in the absence of a demonstration meeting the 15% Volatile Organic Compounds (VOC) reduction required by Reasonable Further Progress (RFP).
 - a. In addition to technical and economic feasibility, Kennecott believes that any controls considered should be evaluated in the attainment modeling demonstration analysis.

- 3) Appropriateness of timelines requiring controls in the SIP.
 - a. Kennecott believes that affected companies should have adequate time to evaluate the feasibility of controls on an appropriate timeline for both internal and external reviews as well as internal assignment of necessary capital. Evaluating feasibility of controls is a multi-step process, including prefeasibility study, feasibility study, detailed engineering and execution. This involves many stakeholders within a company and capital investment at each step. Evaluating feasibility through these phases ensures that the solutions selected for implementation meet not only emissions requirements, but are effective, economically feasible, and address worker environment.

- 4) Whether optional components should be included in the SIP submission.
 - a. Kennecott supports UDAQ in the consideration of international emissions and the preparation of the 179b demonstration. The Salt Lake Valley nonattainment area is unique in its geographical and meteorological conditions and incorporating the 179b demonstration allows Utah to continue a clear dialogue about how international emissions are impacting the airshed in conjunction with local and regional sources. Kennecott supports the incorporation of the 179b demonstration in the current SIP and in future SIP evaluations.

Should you have any questions about these comments, please contact Jenny Esker, Kennecott Principal Advisor, Air Quality, at (801) 569-6494, or Jenny.Esker@riotinto.com.

Regards,

A handwritten signature in black ink that reads "Cassady Kristensen". The signature is written in a cursive, flowing style.

Cassady Kristensen
Environmental Business Partner
Kennecott Utah Copper