McWANE DUCTILE | IRON STRONG

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VIA E-MAIL: jjenks@utah.gov

July 27, 2017

Mr. John Jenks
Environmental Engineer
Utah Division of Air Quality
195 North 1950 West
Salt Lake City, UT 84114-4810

RE: UDAQ BACM Analysis Follow Up

Dear Mr. Jenks:

McWane Ductile's facility located in Provo, Utah (MDU) submitted a Best Available Control Measures/Technology (BACM/BACT) Analysis for the Utah Division of Air Quality (UDAQ) $PM_{2.5}$ Serious Nonattainment State Implementation Plan (SIP) on April 30, 2017 (Original BACM Analysis). This letter addresses the comments MDU received from you on June 29, 2017. This letter is meant to supplement the Original BACM Analysis. Therefore, topics may be introduced or briefly discussed, but rely on the information provided in the original submission. The letter includes the following sections in an effort to address areas of concern:

- Summary of BACT and MSM commitments including date;
- Emission limitations and monitoring requirements to show compliance with daily limits;
- Update to cost analysis as necessary; and
- Review of MSM determinations.

The UDAQ must complete the SIP process by the end of July 2017 so it can be reviewed and approved for public comment by the Air Quality Board (AQB) in September 2017 and finalized in December 2017 for submittal to the Environmental Protection Agency (EPA) by December 31, 2017. In a continued effort to collaborate to improve the air quality of the Salt Lake City Basin and ensure economic growth, MDU expects that UDAQ will provide notification prior to including any limitations or requirements in the SIP. Additionally, notification indicating requirements when the air quality board approves the SIP.

SUMMARY OF BACM DETERMINATIONS

MDU previously evaluated BACT and MSM in the Original BACM Analysis for direct $PM_{2.5}$ and $PM_{2.5}$ precursors (sulfur dioxide (SO_2), nitrogen oxides (NO_x), volatile organic compounds (VOCs), and ammonia (NH_3)). Table 1 summarizes processes that may be changing control technology or limitations as a result of this review.

Specific BACT and MSM commitments for particulate matter are only applied to the filterable portion of $PM_{2.5}$. Condensable $PM_{2.5}$ fractions are represented with the other precursor controls. The commitment date indicates that by the end of the listed year, MDU will be able to install the proposed update for BACT or MSM as applicable. Processes that remain unchanged from its current installation and practice have not been included in Table 1.