State of Utah

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Environmental Quality

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DIVISION OF AIR QUALITY
Bryce C. Byrd
*Director*

DAQC-412-18
Site ID # 10238 (B4)

April 3, 2018

Darrell J. Cunningham
PacifiCorp
Highway 31
Huntington, UT 84528

Dear Mr. Cunningham:

Re: PacifiCorp Huntington Power Plant – Units 1 and 2 – CFR 63 Subpart UUUUU – PM Low Emitting Electrical Generating Unit (LEE) Qualification and Test Schedule – Carbon County

PacifiCorp submitted a notice dated February 28, 2018, that Huntington Power Plant Units 1 and 2 have qualified for LEE status and will reduce the PM MATS test frequency to once every 36-months for Units 1 and 2. In accordance with 40 CFR 63.10006(b), PacifiCorp Huntington Power Plant is allowed to reduce the PM MATS test frequency for Units 1 and 2 to once every 3 years.

If you have any questions, call me at (801) 536-4438 or e-mail me at rleishman@utah.gov.

Sincerely,

Rob Leishman, Environmental Scientist
Division of Air Quality

RL:bp

195 North 1950 West • Salt Lake City, UT
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PACIFICORP

February 28, 2018

Mr. Bryce Bird, Director
Utah Department of Environmental Quality
Division of Air Quality
P. O. Box 144820
Salt Lake City, Utah 84114-4820

Subject: PacifiCorp Huntington Plant – Title V Permit #1501001004 – Submittal of 40 CFR §63 Subpart UUUUU Particulate Matter (PM) Low Emitting Electrical Generating Unit (LEE) Qualification for Unit 1 and for Unit 2

Attn: Mr. Rob Leishman

Dear Mr. Leishman,

The Huntington Plant recently completed a three (3) consecutive year, quarterly PM testing period to qualify Unit 1 and Unit 2 as LEE units. Reference Method 5 was performed in accordance with §63.10005(h)(1)(i) to demonstrate PM emissions were less than fifty (50) percent of the applicable emission limit, 0.030 lb/MMBtu. The corresponding threshold for a LEE unit (50% of the applicable emission limit) is 0.015 lb/MMBtu. The test results show an average PM emission rate over the 3-year period of 0.006 lbs/MMBtu, which qualifies Unit 1 as a LEE. Additionally, the test results for Unit 2 over the same time period were also 0.006 lbs/MMBtu, which also qualifies Unit 2 as a LEE.

Summary reports of the test results for the three (3) year period has been included for your review.

We would appreciate receiving a notice of your office's acceptance of the LEE qualification status at your convenience. Upon acknowledgement of the LEE status by your office, the Huntington Plant MATS PM test frequency will revert to a one test every 36-month cycle.

Should you have any questions, please contact Richard Neilson at (435) 687-4334.

Sincerely,

Darrell J. Cunningham
Managing Director

Enclosures: Source Test Report, Particulate Matter LEE Compliance Testing Summary, Huntington Power Plant Unit 1
Source Test Report, Particulate Matter LEE Compliance Testing Summary, Huntington Power Plant Unit 2

cc: Sara Loiacono, EPA Region VIII

# SOURCE TEST REPORT
# Particulate Matter Low Emitting Electrical Generating Unit Compliance Testing Summary
# 40 CFR Part 63, Subpart UUUUU
# PacifiCorp
# Huntington Power Plant Unit 2
# Huntington, Utah

Prepared For:

**PacifiCorp**
Highway 31
Huntington, Utah 84528

For Submittal To:

**Utah Division of Air Quality**
195 N 1950 W
Salt Lake City, Utah 84114

Prepared By:

**Montrose Air Quality Services, LLC**
990 W. 43rd Avenue
Denver, Colorado 80211

Document Number: **043AS-341317-PP-22**
Submittal Date: **February 15, 2018**

STAC STACK TESTING ACCREDITATION COUNCIL

ACCREDITED TO ASTM D7036 ONLY CERT #3925.01

MONTROSE AIR QUALITY SERVICES

## Introduction

The Mercury and Air Toxics Standards (MATS) rule requires quarterly filterable particulate matter testing at the Huntington Plant Unit #2. The testing began in the second quarter of 2015, and has continued for twelve consecutive quarters. In accordance with §63.10005 (h) (1) to qualify as a low emitting electrical generating unit (LEE) filterable particulate matter test results for each quarter must be less than 50% of the applicable emission limit.

## Test Results

The results of the testing program are given in the table below. Detailed test results were submitted for each quarterly test. As shown, average PM emissions were less than 50% of the applicable emission limit for twelve consecutive quarterly tests, qualifying the unit for Low Emitting EGU (LEE) status.

**PacifiCorp**
**Huntington Unit 2**
**PM Low Emitting EGU (LEE) Test Results Summary**

| Test ID | Test Date | Average PM (lb/mmBtu) | MATS PM Limit* | Average PM (lb/MW-hr) | MATS PM Limit* |
|---|---|---|---|---|---|
| Q2 2015 | 5/13-14/2015 | 0.007 | 0.030 | 0.07 | 0.30 |
| Q3 2015 | 8/12/2015 | 0.007 | | 0.08 | |
| Q4 2015 | 12/16/2015 | 0.008 | | 0.08 | |
| Q1 2016 | 2/10/2016 | 0.005 | | 0.05 | |
| Q2 2016 | 5/10/2016 | 0.007 | | 0.08 | |
| Q3 2016 | 8/24/2016 | 0.002 | | 0.02 | |
| Q4 2016 | 11/9/2016 | 0.003 | | 0.04 | |
| Q1 2017 | 2/8/2017 | 0.006 | | 0.07 | |
| Q2 2017 | 5/9/2017 | 0.003 | | 0.04 | |
| Q3 2017 | 9/19/2017 | 0.008 | | 0.08 | |
| Q4 2017 | 12/6/2017 | 0.005 | | 0.05 | |
| Q1 2018 | 2/7/2018 | 0.005 | | 0.05 | |

*Low Emitter Limits are 0.015 lb/mmBtu and 0.15 lb/MW-hr.