Message

From: Thorstenson, Craig D. [cthorstenson@nd.gov]
Sent: 1/30/2019 11:29:54 PM
To: Wauters, Patrick [wauters.patrick@epa.gov]
CC: Schneider, Kyla K. [kkschneider@nd.gov]; Bingert, Matthew J. [mbingert@nd.gov]; Vukonich, Paul [pvukonich@otpco.com]; Thoma, Mark [mthoma@otpco.com]
Subject: RE: Revised Public Notice
Attachments: Wet Dust Extraction Brochure (003).pdf

Patrick,

Attached is the attachment to the 1/30/19 email from Mark Thoma.

Craig

From: Thorstenson, Craig D.
Sent: Wednesday, January 30, 2019 5:20 PM
To: 'Wauters, Patrick' <wauters.patrick@epa.gov>
Cc: Schneider, Kyla K. <kkschneider@nd.gov>; Bingert, Matthew J. <mbingert@nd.gov>; Vukonich, Paul <pvukonich@otpco.com>; 'Thoma, Mark' <mthoma@otpco.com>
Subject: RE: Revised Public Notice

Patrick,

See the response from Otter Tail Power Company regarding the control equipment replacement.

Regarding the emissions calculations, the emissions change is calculated conservatively using the "actual-to-potential" methodology under the PSD rules. The calculation method is outlined in the calculations attached to the analysis. The calculated emissions increase is due to the past actual emissions being based on a coal throughput of approximately 2.1 million tons/year and the future potential emissions being based on a coal throughput of approximately 3.7 million tons/year. The "actual-to-potential" methodology often results in the calculation of an emissions increase (even when the hourly emissions are reduced). Past actual emissions can be compared to projected actual emissions under the PSD rules; however, this is not necessary if the more conservative "actual-to-potential" methodology is used and results in an emissions increase less than the significant emission rates.

Feel free to contact me with any questions.

Craig

Craig Thorstenson
Environmental Engineer
Permitting Supervisor
North Dakota Department of Health
Division of Air Quality
918 E. Divide Ave., 2nd Floor
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From: Thoma, Mark <mthoma@otpco.com>
Sent: Wednesday, January 30, 2019 10:31 AM
To: Thorstenson, Craig D. <cthorstenson@nd.gov>
Cc: Schneider, Kyla K. <kkschneider@nd.gov>; Bingert, Matthew J. <mbingert@nd.gov>; Vukonich, Paul <pvukonich@otpco.com>
Subject: RE: Revised Public Notice

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Craig,
We are primarily making the change from a safety perspective. The current dry collection systems are located inside the plant building, which presents a hazard. Attached is a page from the manufacturer's brochure that compares the benefits of wet dust extraction.

I know you are addressing EPA's second question, but Otter Tail's projections showed a decrease in emissions with this new equipment as described in our original application, and even those were conservative because we compared past actual emissions (using past emission inventories) to future potential (using the emission rate of the new equipment x 8760 hours). Feel free to supply EPA the information we supplied in our application if that helps.

Regards,

Mark

Mark Thoma
Manager, Environmental Services
Direct: 218-739-8526
Cell: 218-205-4381
mthoma@otpco.com

From: Thorstenson, Craig D. <cthorstenson@nd.gov>
Sent: Tuesday, January 29, 2019 2:30 PM
To: Thoma, Mark <mthoma@otpco.com>
Cc: Schneider, Kyla K. <kkschneider@nd.gov>; Bingert, Matthew J. <mbingert@nd.gov>
Subject: FW: Revised Public Notice

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Mark,

Regarding Patrick's first question, can you explain why the Coyote Station is making the control equipment change?

I will answer the other question.

Thanks,

Craig

From: Wauters, Patrick <wauters.patrick@epa.gov>
Sent: Tuesday, January 29, 2019 12:27 PM
To: Thorstenson, Craig D. <cthorstenson@nd.gov>
Subject: RE: Revised Public Notice

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Hi Craig,

I have a couple quick questions I'm hoping you can answer. Why is Coyote Station making this control equipment change (what are the advantages that justify costs of switching from baghouses to the wet dust extractive systems?), and why is there is an increase in PM emissions when it appears that the limits for PM in lb/hr is lower for the new equipment? The 2018 proposed TV permit lists emission limits for Units M3 and M4 as 5.66 lb/hr and 4.87 lb/hr, respectively, while the proposed PTC lists the limits for the same units as 1.69 lb/hr and 1.27 lb/hr. If the new limits are more stringent shouldn't there be a reduction in PTE not an increase of 5.7 tons?

Thanks,

Patrick

From: Thorstenson, Craig D. <cthorstenson@nd.gov>
Sent: Monday, January 28, 2019 2:14 PM
To: Thoma, Mark <mthoma@otpco.com>
Cc: Wauters, Patrick <wauters.patrick@epa.gov>
Subject: Revised Public Notice

Mark,

Attached is a revised public notice for the project to replace control equipment at the Coyote Station.

Feel free to contact me with any questions.

Craig Thorstenson
Environmental Engineer
Permitting Supervisor
North Dakota Department of Health
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