

Comments Received for the 2016 Amendments to Part H
of the PM10 and PM2.5 SIP

November 3, 2016

John,

We have the following comments regarding the source-specific limitations for Big West Oil in the proposed Moderate PM2.5 SIP:

- Add a statement to IX.H.12.b.iii.B regarding the use of CEMS to calculate daily emissions of SO₂ as outlined in IX.H.11.f under the source-wide SO₂ cap. This will make it consistent with the NOx cap provisions.
- Add a statement to IX.H.12.b.iii.B defining a day as a period of 24-hours commencing at midnight and ending at the following midnight under the source-wide SO₂ cap. This will make it consistent with the NOx cap provisions.
- Substitute daily average for hourly averages of CEM readings for H2S in IX.H.12.b.iii.B. The calculation and recording of hourly averages serves no purpose and is unnecessarily burdensome for compliance with a daily limit.

Thanks for your help, John. Let us know if you have any questions and if we need to submit these comments through Ryan Stephens or someone else.

Stuart Smith
Environmental Manager
North Salt Lake Refinery
Big West Oil, LLC
Office: [801-296-7828](tel:801-296-7828)

OCT 28 2016

DIVISION OF AIR QUALITY

Hand Delivered



TESORO

Tesoro Refining & Marketing Company LLC
474 West 900 North
Salt Lake City, UT 84103

October 28, 2016

Mr. Bryce Bird
Director
Utah Division of Air Quality
P.O. Box 144820
Salt Lake City, UT 84116

RE: Comments on the Proposed PM_{2.5} State Implementation Plan

Dear Mr. Bird:

Tesoro Refining & Marketing Company LLC (Tesoro), Salt Lake City Refinery respectfully submits the following comments to the proposed PM_{2.5} State Implementation Plan (SIP). These comments are in response to the notices in the October 1, 2016 Utah State Bulletin (DAR Files 40766) regarding the proposed PM_{2.5} State Implementation Plan.

Tesoro's comments below pertain to the proposed revisions to SIP sections IX.H.12.

Comments on IX.H.12.q – Tesoro Refining and Marketing Company: Salt Lake City Refinery

H.12.g.ii. Sourcewide NOx Cap

By no later than January 1, 2019, combined emissions of NOx shall not exceed 1.988 tons per day (tpd) and 475 tons per rolling 12 month period.

Tesoro requests a revised sourcewide NOx cap for daily emissions based upon language changes made in IX.H.11.d.i. The proposed SIP changes require that all emission limitations apply at all times, whereas the existing SIP language requires that all emission limitations only apply during steady-state operations. Emissions from startup and shutdown were not accounted for as part of development of the SIP emission caps. Tesoro conducted a review of emissions from these activities and determined that the daily emission caps need to be adjusted to include emissions during the expected but limited startup and shutdown activities at the refinery. While Tesoro minimizes emissions during these infrequent startup/shutdown activities at the refinery, an adjustment of the cap is required.

Tesoro proposes the following modification to the paragraph:

“By no later than January 1, 2019, combined emissions of NOx shall not exceed 2.3 tons per day (tpd) and 475 tons per rolling 12 month period.”

H.12.g.ii.A Setting of emission factors:

The emission factors derived from the most current performance test shall be applied to the relevant quantities of fuel combusted. Unless adjusted by performance testing as discussed in IX.H.12.rp.ii.B below, the default emission factors to be used are as follows:

Natural gas/refinery fuel gas combustion using:

Low NOx burners (LNB): 41 lbs/MMbtu...

Tesoro has identified an apparent typographical error in the units of the default emission factor for Low NOx burners provided in this section. The emission factor stated in the section for a different covered refinery is 41 lbs/MMscf and we believe that this was the intent for the default factor applicable to Tesoro. Additionally Tesoro requests that the emission factor be stated in units of lb/MMBtu. An

equivalent emission factor in these units is 0.051 lb/MMBtu.¹ Tesoro prefers an emission factor with these units in order to be consistent with how other emission factors are used at the refinery.

H.12.g.ii.B. The default emission factors listed in IX.H.12.rp.ii.A above apply until such time as stack testing is conducted as outlined below:

Initial NOx stack testing on natural gas/refinery fuel gas combustion equipment above 100 MMBtu/hr has already been performed and shall be conducted at least once every three (3) years following the date of the last test. At that time a new flowweighted average emission factor in terms of: lbs/MMbtu shall be derived for each combustion type listed in IX.H.12.rp.ii.A above. Stack testing shall be performed as outlined in IX.H.11.e.

Tesoro requests revised language included in this condition to ensure the use of emission factors from NOx stack testing for any combustion equipment is allowed. Emission factors developed from stack testing will be more representative and have a higher degree of accuracy than default emission factors. In addition, Tesoro requests to ability to use a NOx Certified Emissions Monitoring System (CEMS) instead of stack testing if such equipment is operated on the combustion equipment. The following is Tesoro's propose language changes:

H.12.g.ii.B. The default emission factors listed in IX.H.12.rp.ii.A above apply unless stack testing results are available, as outlined below:

Initial NOx stack testing on natural gas/refinery fuel gas combustion equipment above 100 MMBtu/hr has already been performed and shall be conducted at least once every three (3) years following the date of the last test. At that time a new flowweighted average emission factor in terms of: lbs/MMbtu shall be derived for each combustion type listed in IX.H.12.rp.ii.A above. Stack testing shall be performed as outlined in IX.H.11.e. Stack testing is not required for natural gas/refinery fuel gas combustion equipment with a NOx CEMS.

H.12.g.iii. Sourcewide SO2 Cap

By no later than January 1, 2019, combined emissions of SO2 shall not exceed 3.1 tons per day (tpd) and 300 tons per rolling 12month period.

Tesoro is proposing a revised sourcewide SO₂ cap for daily emissions based upon changes made in IX.H.11.d.i. The proposed SIP changes require that all emission limitations apply at all times, whereas the existing SIP language requires that all emission limitations only apply during steady-state operations. Emissions from startup and shutdown were not accounted for as part of the development of the SIP emission caps. Tesoro conducted a review of emissions from these activities and determined that the daily emission caps need to be adjusted to include emissions during these expected, but limited startup and shutdown activities at the refinery. While Tesoro minimizes emissions during these infrequent startup/shutdown activities at the refinery, an adjustment of the cap is required.

Tesoro proposes the following modification to the paragraph:

"By no later than January 1, 2019, combined emissions of SO2 shall not exceed 3.8 tons per day

¹ This factor is based upon a conservatively high refinery fuel gas heat content of 800 Btu/scf.

(tpd) and 475 tons per rolling 12 month period."

H.12.g.iii.B Compliance with the sourcewide SO₂ Cap shall be determined for each day as follows...

Tesoro operates a sulfur recovery unit (SRU) which emits SO₂ and is included under the emissions cap. Tesoro proposes the following addition to the paragraph to describe the method to determine emissions consistent with the condition from another refinery covered under the SIP:

"SRUs: The emission rate shall be determined by multiplying the sulfur dioxide concentration in the flue gas by the flow rate of the flue gas. The sulfur dioxide concentration in the flue gas shall be determined by CEM as outlined in IX.H.11.f."

Proposed New Condition H.12.q.iii.C: Instead of complying with Condition IX.H.11.g.ii.A, By no later than January 1, 2018, reduce the H₂S content of the refinery plant gas to 60 ppm or less or reduce SO₂ concentration from fuel gas combustion devices to 8 ppmvd at 0% O₂ or less as described in 40 CFR 60.102a. Compliance shall be based on a rolling average of 365 days. The owner/operator shall comply with the fuel gas or SO₂ emissions monitoring requirements of 40 CFR 60.107a and the related recordkeeping and reporting requirements of 40 CFR 60.108a. As used herein, refinery "plant gas" shall have the meaning of "fuel gas" as defined in 40 CFR 60.101a, and may be used interchangeably.

Tesoro proposes a new condition above to be added into the Tesoro SIP section to clarify that there are compliance alternatives when demonstrating compliance with the requirements limiting SO₂ emissions from fuel gas combustion devices. The federal requirements referenced in the current condition IX.H.11.g.ii.A provide options to monitor either H₂S content of the fuel gas, or SO₂ concentrations in the exhaust from the fuel gas combustion devices. The proposed language is similar to the existing language with additional clarification that monitoring of SO₂ concentrations is an acceptable method of compliance demonstration.

Thank you for the opportunity to provide comments. Tesoro will continue to support UDAQ in their efforts to attain for the PM_{2.5} standards. Should you have any questions regarding these comments, please do not hesitate to contact me.

Sincerely,



William K. Snarr
Environmental, Health and Safety Manager



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October 21, 2016

Mr. Bryce Bird
Director
Utah Division of Air Quality, Fourth Floor
195 North 1950 West
Salt Lake City, UT 84116-3085

UTAH DEPARTMENT OF
ENVIRONMENTAL QUALITY

OCT 24 2016

DIVISION OF AIR QUALITY

RE: UPA COMMENT ON SIP SUBSECTION IX. PART H: EMISSION LIMITS AND OPERATING PRACTICES

Dear Mr. Bird:

The Utah Petroleum Association (UPA) appreciates the opportunity to comment on SIP Subsection IX. Part H: Emission Limits and Operating Practices. UPA recommends replacing the current language in paragraph IX.H.11.c.iii with the following:

Each source shall submit a report to the Director of any deviation from the applicable requirements of this Subsection IX.H, including those attributable to upset conditions, unless the deviation is reportable under the requirements of R307-415-6a or the breakdown provisions of R307-107. The report shall be submitted no later than 24-months following the deviation or earlier if specified by an underlying applicable requirement and shall include the probable cause of such deviations and any corrective actions or preventive measures taken.

Please feel free to contact me for any clarification or questions regarding this comment. I can be reached at (801) 619-6680.

Sincerely,

Lee J. Peacock
President



WESTERN RESOURCE
ADVOCATES

October 31, 2016

Bryce Bird, Director
Ryan Stephens
Public Comment
Utah Division of Air Quality
PO Box 144820
Salt Lake City, UT 84114-4820

via email: bbird@utah.gov
 rstephens@utah.gov

Re: Comments on R307-110-10; Amended SIP Subsection IX, Part H: Emission Limits and Operating Practices, specifically PM 2.5 Requirements in Subparts H. 11, 12, and 13, and the PM10 requirements in Subpart H.2; and the Technical Support documentation for the Amended SIP.

Dear Mr. Bird and Mr. Stephens,

Thank you for this opportunity to comment on R307-110-10; Amended SIP Subsection IX, Part H: Emission Limits and Operating Practices, specifically PM 2.5 Requirements in Subparts H. 11, 12, and 13, and the PM10 requirements in Subpart H.2; and the Technical Support documentation for the Amended SIP. I make these comments on behalf of Utah Physicians for a Healthy Environment, FRIENDS of Great Salt Lake, CleanAirNow!, The U. Student Clean Air Network and Western Resource Advocates (collectively “Utah Physicians”).

Commenting Organizations

Utah Physicians for a Healthy Environment is the largest community service organization of health professionals in the state of Utah. The organization and its members are health professionals, toxicologists, biologists, chemists and engineers dedicated to protecting the health and well-being of the citizens of Utah.

FRIENDS of Great Salt Lake has, as its mission, the preservation and protection of the Great Salt Lake ecosystem. The organization seeks to increase public awareness and appreciation of the Lake through education, research, and advocacy. FRIENDS has long been involved in the protection and restoration of Great Salt Lake and its ecosystems, advocating for ways in which the public may enjoy these resources by fishing, birdwatching, boating, photographing, hiking and studying these natural areas.¹

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Western Resource Advocates is a regional non-profit conservation organization headquartered in Boulder, Colorado with programs and staff spanning the intermountain west, including Utah. Our mission is to protect the land, air and water of our region, using law, science, economics, advocacy, education, and action. To this end, we work to curb climate change and achieve environmentally sustainable management of energy, land, and water resources.

CleanAirNow! is a community based group that is looking for immediate solutions to Utah's air pollution crisis. While the organization appreciates long-term efforts to clean our air, its position is that because we breathe the air of today it wants CleanAirNow! The U. Student Clean Air Network is a student organization dedicated to getting university students involved in the clean air dialogue.

The organizations' interest in the present matter is based on the public health crisis that exists as a result of severe and frequent spikes in PM_{2.5} air pollution that occur in northern Utah. These acute, and often long lasting episodes of high concentrations of PM_{2.5} jeopardize the well-being of northern Utah's residents.

Summary

While we greatly appreciate amendments to the PM₁₀/PM_{2.5} SIP (SIP) that will require CEMS wherever feasible, we do not believe that stack testing frequencies of three years are adequate to ensure continuous compliance with SIP emission limitations and that the record that supports the SIP fails to show that these that these frequencies are sufficient. *See* DAQ-046-16 at 2. Rather, stack testing of SIP emission limitations should occur every year.

Background

The proposed amendment to the PM₁₀/PM_{2.5} SIP (SIP) purports to "assign stack testing frequencies at no less than once every 3 years, and employ where practicable the use of interim, parametric monitoring (between stack tests)" DAQ-046-16 at 2. The SIP states that unless source-specific conditions indicate otherwise, H.11.e establishes the stack testing protocol intended to show that sources in the Salt Lake City and Provo nonattainment areas are complying with the applicable SIP emission limits. PM_{2.5} Emission Limits and Operating Practices, Section IX, Part H. As 11.e does not specify a stack testing frequency, the default is once every five years. *Id.*; Utah Admin. Code R307-165-2. In most instances, there is no explanation or

populations such as children, the elderly and asthmatics. 42 U.S.C. § 7409(b)(1). Secondary standards provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. *Id.* at § 7409(b)(2). Therefore, FRIENDS of Great Salt Lake, its staff and its members have a strong legal interest in the Clean Air Act and Utah Air Conservation Act's protection of public health as well as the environment, including water quality in Great Salt Lake, the well-being of the birds and other wildlife that inhabit the Lake and the habitat on which they rely.

showing, either generally or specific to the PM_{2.5} SIP sources, to establish that any monitoring regime is sufficient to assure continuous compliance with any particular SIP emission limitation. This is particularly true when monitoring is based on emission factors derived from stack testing. Moreover, there is not an adequate explanation of when or why the use of interim, parametric monitoring (between stack tests) is practicable.

In commenting on the 2014 PM_{2.5} SIPs, EPA expressed significant concern about the sufficiency of the infrequent monitoring of PM_{2.5} SIP emission limits. *E.g.* EPA Region 8 Comments on Utah’s Proposed PM_{2.5} State Implementation Plans and Technical Support Documents at 7, 9-10 & 12 (Oct. 30, 2014). EPA emphasized that adequate monitoring is a crucial component of an acceptable SIP, *id.* at 12 (“Implementation includes adequate monitoring, which must be in the SIP.”), and that stack testing once every three to five years is, on its face, inadequate to show continuous compliance, *id.* at 9-10 (“We are concerned with stack test frequencies longer than one year. Please explain why these test frequencies are sufficient to ensure continuous compliance with the limits.”), and requested that the Director explain why the specified monitoring was adequate to support modeling, establish RACT and demonstrate attainment. *Id.* at 7 (“[W]e suggest that the UDAQ...clarify and provide more detail...in SIP sections and/or RACT evaluations” to explain “how and why...frequency of monitoring/testing...(continuous, daily, monthly, etc. for monitoring; once per year, 3 years, 5 years for stack testing)...[is] considered valid to support modeling and attainment”).

A nonattainment SIP shall provide for the implementation of all reasonably available control measures (RACM), including reasonably available control technology (RACT), as expeditiously as practicable. 42 U.S.C. § 7502(c)(1); 80 Fed. Reg. at 15369.² In setting forth additional requirements for particulate matter nonattainment areas, Congress mandated that Moderate area attainment plans contain provisions to assure that RACM and RACT are implemented no later than four years after designation, 42 U.S.C. § 7513a(a)(1)(C), or in the case of the Utah nonattainment areas, no later than December 2013. 74 Fed. Reg. at 58768-70 (November 13, 2009) (designating the Three NAAs on December 14, 2009). Thus, Utah’s Moderate SIP must provide for the implementation of RACM and RACT for existing sources of PM_{2.5} and PM_{2.5} precursors as expeditiously as practicable, but no later than December 2013. This is true even in the case of Moderate areas that cannot practicably attain by the statutory attainment date and therefore will be or have been designated as Serious areas. 80 Fed. Reg. at 15369.

Beyond RACM and RACT, nonattainment SIPs must “include enforceable emission limitations, and such other control measures, means or techniques. . . as may be necessary or appropriate to provide for attainment.” 42 U.S.C. § 7502(c)(6). EPA has interpreted this provision to require states to implement any technologically and economically feasible control measures, including control technologies, for all sources of direct PM_{2.5} and PM_{2.5} precursors,

² *Id.* at 15464 (RACM “is any technologically and economically feasible measure that can be implemented in whole or in part within 4 years after the date of designation of a PM_{2.5} nonattainment area and that achieves permanent and enforceable reductions in direct PM_{2.5} emissions and/or PM_{2.5} precursor emissions from sources in the area. RACM includes reasonably available control technology (RACT)”).

that can only be implemented **after** the 4 year deadline for RACM and RACT has passed, but **before** six years after the designation date. 80 Fed. Reg. at 15368.³ In the case of the Three NAAs, Utah must impose all additional reasonable measures that are capable of being implemented before December 31, 2015. In Moderate areas that cannot practicably comply with the standard by the statutory attainment date, states must still implement all RACM and RACT, together with any additional reasonable measures, on sources in the nonattainment area. 80 Fed. Reg. at 15369.

Utah is currently under significant obligation to impose reasonable and best control measures on and secure substantial emission reductions from industrial sources in the nonattainment areas. The Clean Air Act requires Utah to have implemented all RACM and other additional reasonable measures by December 31, 2015. Ultimately, the Clean Air Act mandates attainment of the 24-hour PM_{2.5} standard as soon as is feasible. There is real urgency in the mandate that Utah immediately take the steps necessary to bring the Three NAAs into attainment with the standard.

Stack Tests at Three Year Intervals are Inadequate to Show Continuous Compliance and to Meet other SIP Requirements.

SIP control measures be enforceable. SIPs must provide for the expeditious implementation of all reasonably available or best available control measures for larger emitting facilities. 42 U.S.C. § 7502(c)(1); 42 U.S.C. § 7513a(a)(1)(C); 42 U.S.C. § 7513a(b)(1)(B).⁴ These controls must be “enforceable,” 42 U.S.C. § 7502(c)(6) (“plan provisions shall include enforceable emission limitations”), and “measurable,” and “include periodic source testing, monitoring or other viable means to establish whether the source meets the applicable emission limit.” 80 Fed. Reg. at 15378. As EPA explained in more detail:

[SIP] control measures must be enforceable. This means that they must...include periodic source testing, monitoring or other viable means to establish whether the affected source meets the applicable emission limit. Additionally, to verify the continued performance of the control measure, specific emissions monitoring programs appropriate for the type of control measure employed and the level of emissions must be included to verify the continued performance of the control measure.

Id.

Three year intervals between stack testing is insufficient to establish that the affected source will meet the applicable emission limitation. Nor could the record support such a claim.

³ *Id.* at 15464 (“Additional reasonable measure is any control measure that otherwise meets the definition of [RACM] but can only be implemented in whole or in part during the period beginning 4 years after the date of designation of a nonattainment area and no later than the end of the sixth calendar year following the date of designation of the area.”).

⁴ SIPs must also provide for additional reasonable measures and additional feasible measures. 80 Fed. Reg. 15340, 15468 & 15469 (March 23, 2015). These measures must also be enforceable. *Id.*

Too much can change in three years. Equipment can wear out, inputs can change, processes can alter and other factors can affect emissions. Yet, neither the source nor the agency would be in a position to know whether the source is in compliance with its emission limits until considerable time has elapsed.

More Frequent Monitoring is RACM.

EPA has noted that more frequent monitoring will reduce emissions of PM_{2.5} and PM_{2.5} precursors from industrial sources and therefore represents RACM. EPA has found that improved monitoring provides information that allows a source to take “corrective action that could potentially reduce emissions up to 15 percent[.]” 80 Fed. Reg. 15340, 15378. Similarly, more frequent monitoring “could yield potential stationary source emissions reductions of up to 13 percent.” *Id.* Therefore, monitoring more frequently than every three years is a necessary part of an adequate SIP

More Frequent Monitoring is Improves Emission Inventories

EPA has found that more frequent monitoring serves to increase the accuracy of emission inventories and to identify appropriate control measures. 80 Fed. Reg. at 15453. Thus, the yearly monitoring would play an important role in the derivation and implementation of the Serious SIP Utah must submit to EPA to show expeditious attainment of the NAAQS.

Frequent Monitoring is Necessary to Make SIP Emission Limitations Effective

EPA acknowledges the link between control measures and monitoring requirements – without monitoring, control measures are not meaningful – and identifies monitoring as a component of a legally sufficient SIP. *E.g.* 80 Fed. Reg. at 15453 (“[A]ppropriate stationary source emissions monitoring requirements, like the control measures with which they are associated, are a fundamental element of an approvable implementation plan.”). The rule sets as the standard CEMS for measuring and monitoring of emissions. *Id.* at 15448 (“Directly enforceable emission measurements, such as PM CEM[S], are preferred wherever feasible.”). *Id.* at 15447 (“[M]onitoring requirements would have to be sufficient to enable the state or the EPA to determine whether the source is complying with the emission limit on a continuous basis.”). EPA policy that is that compliance information be readily accessible by the public. *Id.* at 15448 (“EPA also recommends that compliance reports be made available online so that the general public can readily access the information without the need to submit Freedom of Information Act (FOIA) requests to the EPA. The EPA is in the process of revising federal rules to make similar requirements apply.”).

Monitoring intervals of three years fail to allow the public to determine whether a source is complying with its SIP emission limitations and prevents the public from enforcing SIP emission limitations. Under the current proposal, three years could elapse before the public could determine compliance or enforce any failure to comply. Such an approach fails to meet the requirements for an adequate SIP.

Thus, frequent monitoring – no less than once a year for stack testing – is a critical element of a Moderate/Maintenance SIP and a reasonable measure that will make Utah’s SIP

control measures enforceable and will reduce emissions to ensure, as the Clean Air Act requires, that the nonattainment areas will attain the 24-hour PM_{2.5} national standards as expeditiously as practicable, *see e.g.* 42 U.S.C. § 7513(c)(1) & (c)(2).

Thank you for the opportunity to comment on the proposed Amended SIPs and for all you do to improve and protect air quality in Utah.

A handwritten signature in black ink, appearing to read 'Joro Walker', positioned above a horizontal line.

JORO WALKER

ROB DUBUC

Attorneys for Utah Physicians, *et al.*



WESTERN RESOURCE
ADVOCATES

October 31, 2016

Bryce Bird, Director
Ryan Stephens
Public Comment
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via email: bbird@utah.gov
 rstephens@utah.gov

Re: Additional Comments on R307-110-10; Amended SIP Subsection IX, Part H: Emission Limits and Operating Practices, specifically PM 2.5 Requirements in Subparts H. 11, 12, and 13, and the PM10 requirements in Subpart H.2; and the Technical Support documentation for the Amended SIP.

Dear Mr. Bird and Mr. Stephens,

Thank you for this opportunity to provide additional comment on R307-110-10; Amended SIP Subsection IX, Part H: Emission Limits and Operating Practices, specifically PM 2.5 Requirements in Subparts H. 11, 12, and 13, and the PM10 requirements in Subpart H.2; and the Technical Support documentation for the Amended SIP. Please note this is the second set of comments submitted by Western Resource Advocates on October 31, 2016. Thank you for taking the time to fully review both sets of comments.

Summary

Recently, Western Resource Advocates requested, pursuant to GRAMA, that the Division of Air Quality release compliance documents kept by a source pursuant the Fugitive Emissions and Fugitive Dust Rule for PM_{2.5} Nonattainment areas. The source is a significant source of fugitive dust. The Division refused the request based on the fact that it did not have possession of the records and had no obligation to ask that the source provide them. The proposed amendments to the PM₁₀/PM_{2.5} SIP includes a provision applicable to the Bingham Canyon Mine that

Records of water and/or chemical dust control treatment shall be kept for all periods when the BCM is in operation.

SIP Amendments at 45.

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To the extent that Kennecott will maintain control of these documents and the Division will refuse to request them for the purposes of a GRAMA request, this provision fails to meet SIP requirements. The SIP will not be federally enforceable and the public will be prevented from determining whether or not Kennecott is complying with a SIP emission limitation and will be prevented from enforcing this emission limitation.

Similar analysis applies to every instance in the proposed amendments that authorizes a source to maintain compliance records. Such an approach occurs with alarming frequency in the amendments. Therefore, the proposed SIP amendments are not adequate to comply with the Clean Air Act.

Thank you for the opportunity to comment on the proposed Amended SIPs and for all you do to improve and protect air quality in Utah.

A handwritten signature in black ink, appearing to read 'Joro Walker', positioned above a horizontal line.

JORO WALKER

ROB DUBUC

Attorneys for Utah Physicians, *et al.*