



May 25, 2021

Alaska Department of Environmental Conservation
Air Quality Division, Air Permits Program
ATTN: Kathie Mulkey
555 Cordova Street,
Anchorage, AK 99501

**SUBJECT: Comments Regarding Preliminary Permit Decision for the Fort
Wainwright (Privatized Emission Units), Air Quality Operating
Permit AQ1121TVP03 and Air Quality Control Minor Permit
AQ1121MSS04**

Doyon Utilities, LLC (DU) has reviewed the preliminary Operating Permit AQ1121TVP03 and the accompanying Statement of Basis. DU has also reviewed the preliminary Minor Permit AQ1121MSS04 and associated Technical Analysis Report. Pursuant to 18 Alaska Administrative Code (AAC) 50.326(k) and 18 AAC 50.542(d), DU submits the attached comments.

Please contact Mr. Isaac Jackson at 907-455-1547 or at ijackson@doyonutilities.com with any questions.

A handwritten signature in blue ink, appearing to read 'Shayne Coiley'.

Shayne Coiley
Senior Vice President

cc: Courtney Kimball, Boreal – Fairbanks, w/att.

Attachment:
Comments - Preliminary Permits AQ1121TVP03 and AQ1121MSS04

CO 21-052

COMMENTS: Preliminary Air Quality Control Minor Permit No. AQ1121MSS04

- 1) Table of Contents. The Table of Contents includes references to “Section 6 Complaint Form” and “Attachment 1 – Visible Emissions Form” These elements are not part of the permit. Please revise the Table of Contents to remove reference to the Complaint Form and the Visible Emissions Form, and to reflect that the ADEC Notification Form is Attachment 1 instead of Attachment 2. (Alternately, as addressed in the comment below, the ADEC Notification Form may also be able to be removed from the permit and therefore the Table of Contents.)
- 2) Attachment 1, ADEC Notification Form. The ADEC Notification Form does not need to be included in this permit. Several conditions in the permit include excess emissions or permit deviations reporting requirements. Those conditions require the reports in accordance with the Excess Emissions and Permit Deviation condition in the applicable operating permit. As a result, DU would use the Notification Form as provided in the Title V operating permit instead.

COMMENTS: Preliminary Technical Analysis Report for Air Quality Control Minor Permit No. AQ1121MSS04

- 3) Section 3. On page 2, a bullet list of requested conditions is provided. The third bullet states that the permit application requested a condition “requiring EUs 1 through 6 to comply with work practice standards except during startup and shutdown.” Please revise this bullet to reflect that DU requested work practice standards that would apply during startup and shutdown, per proposed condition 3 in Attachment A-3 of the permit application.
- 4) Section 5, Item 4. This paragraph states that the current Operating Permit is AQ1121TVP02, Revision 3. Please revise this statement to reflect that the current Operating Permit is AQ1121TVP02, Revision 2.

COMMENTS: Preliminary Air Quality Operating Permit No. AQ1121TVP03

- 5) Table A. Please revise the Emissions Unit Name for Emissions Unit (EU) ID 31a to reflect the information provided in the permit application as follows.

Emergency ~~Generator Pump~~-Engine

- 6) Table A. Please revise the Emissions Unit Description for EU ID 37 as requested in the amendment to the permit application. The unit is installed at Manhole 507.

~~MH Building~~ 507

- 7) Condition 3. Please revise the language for consistency with Condition 2.1 in Air Quality Operating Permit No. AQ1121TVP02, Revision 2.

Visible emissions from any of the baghouses on EU IDs 7a, 7b, and 7c do not have to be observed until the cumulative PM10 emissions from EU IDs 7a, 7b, and 7c are more than 1,500 pounds ~~or more~~ in any consecutive 12-month period, according to the following formula:

- 8) Condition 4.2. Please revise this condition as follows for clarity or revise the term “this condition” to refer to a specific condition or sub-condition.

Operate and maintain the COMS in accordance with the manufacturer’s written requirements and recommendations and as set out in ~~this condition~~ ~~and~~ Condition 62.5c;

- 9) Condition 4.4. Please revise this condition as follows for clarity.

At least once daily, conduct ~~a~~-zero and upscale (span) calibration drifts checks in accordance with a written procedure, as described in 40 CFR 60.13(d); adjust whenever the zero or upscale drift error exceeds four percent opacity in a 24-hour period.

- 10) Condition 4.6. Please revise this condition so that the language is identical to Condition 3.3 in Air Quality Operating Permit No. AQ1121TVP02, Revision 2, which requires 18-minute visible emissions observations on a daily basis. DU worked with ADEC to develop the language in Condition 3.3 of AQ1121TVP02, Revision 2 to ensure the ADEC gap-filling needs were met and to ensure that the requirement was consistent with the definition of “out-of-control” as applicable in 40 CFR 63 Subpart DDDDD. The existing language in Condition 3.3 of AQ1121TVP02, Revision 2 is sufficient to meet the requirement and DU sees no reason to change the language.

DU notes that the trigger in the proposed permit condition “out of service or has failed a performance audit” does not include all “out-of-control” scenarios. Using the phrase “out-of-control” in this condition is consistent with applicable continuous monitoring requirements for these boilers.

Additionally, the boilers EU IDs 1 through 6 are not subject to 40 CFR 60 New Source Performance Standards (NSPS). If the boilers were subject to an NSPS, 40 CFR 60 Subpart Dc would not be applicable. As a result, requirements from 40 CFR 60 Subpart Dc are inappropriately imposed. DU notes that the existing language in Condition 3.3 of AQ1121TVP02 Revision 2 requires daily observations while the Subpart Dc requirement is for monitoring at a minimum of every 45 days. DU does not understand why ADEC has proposed to revise this permit condition or why the proposed revision includes inapplicable requirements which are not imposed consistent with the underlying regulation.

ADEC has referenced the Method 9 visible emission monitoring requirements for similar gap-filling purposes in other Title V permits (see Condition 54.1f of AQ0173TVP03 for the Healy Power Plant). Note that monitoring under Condition 54.1f of AQ0173TVP03 is only required monthly.

Condition 4.6, as proposed, does not appear to allow for any initial response time. DU and ADEC considered this issue when drafting the language that currently appears in Condition 3.3 of AQ1121TVP02 Revision 2, which allows for up to 24 hours before a Method 9 is required.

Please replace Condition 4.6 with the language from Condition 3.3 in AQ1121TVP02, Revision 2. Accordingly, please remove Conditions 4.6a and 4.6b. The language in Condition 3.3 of AQ1121TVP02, Revision 2, is below, including the applicable footnotes.

In the event that a COMS for any of the emission units is out-of-control¹ or out of service for more than one day, during each day that the emission unit is in operation, observe the opacity of the emission unit's exhaust in accordance with Condition 7.3.

Footnote -

¹ A COMS is out of control if:

(A) Daily Assessments. Whenever the calibration drift exceeds twice the specification of PS-1, the COMS is out-of-control. The beginning of the out-of-control period is the time corresponding to the last successful drift-check. The end of the out-of-control period is the time corresponding to the completion of appropriate adjustment and subsequent successful calibration drift assessment.

(B) Quarterly and Annual Assessment. Whenever a quarterly performance audit or annual zero alignment audit indicates unacceptable results, the COMS is "out-of-control." The beginning of the out-of-control period is the

time corresponding to the completion of the performance audit indicating an unacceptable performance. The end of the out-of-control period is the time corresponding to the completion of appropriate corrective actions and subsequent successful audit (or, if applicable, partial audit).

- 11) Condition 9.1. Please revise this condition as follows to correct a typographical error.

In the first operating report required in Condition 100 under this permit term, the Permittee shall state the intention to either continue the visible emissions monitoring schedule in effect from the previous permit or reset the visible emission monitoring schedule.

- 12) Condition 9.3b. Please revise this condition as follows. This reporting condition is applicable to the monitoring requirements in Conditions 3 and 7 for the industrial processes and liquid fuel-burning equipment (EU IDs 7a through 37). The recordkeeping and reporting requirements in Conditions 5 and 6 address the monitoring required under Condition 4 for the coal-burning equipment (EU IDs 1 through 6). Please do not include requirements for EU IDs 1 through 6 in a condition that addresses other emissions units.

if any monitoring under Conditions 3 ~~through or~~ 7 was not performed when required, report within three days of the date the monitoring was required.

- 13) Condition 12.2.a. Please revise this condition as follows for consistency with Standard Permit Condition XIII.4.2a or provide a rationale in the Statement of Basis for the change to the standard condition.

Conduct the tests in accordance with Section 7 and report the ~~PM (filterable plus condensable)~~ results in accordance with Condition 93. For tests required under Condition 12.2b, submit the test plan as required by Condition 91 and at least 60 days before the deadline for the next test under Condition 12.2b;

- 14) Condition 12.3b. Please revise this condition as follows for consistency with Standard Permit Condition XIII.4.3b – Coal-Fired Boilers.

Except during breakdowns, repairs, calibration checks and zero and span adjustments of the device, complete at least one cycle of sampling and analyzing for each successive ~~10-15~~-minute period of boiler operation; from this data, calculate and record the average steam production rate for successive one-hour periods; maintain this data at the facility and make it available to the Department upon request;

- 15) Conditions 24 and 25. Please revise these conditions to remove EU IDs 8, 9, 14, 22, 23, 29a, 31, and 34 through 36. Conditions 24 and 25 will then address only EU IDs 30a, 32a, 33a, and 37, which are not included in the State Implementation Plan

(SIP) Requirements in Condition 34. DU is requesting the addition of new, separate conditions to address the sulfur compound requirements for EU IDs 8, 9, 14, 22, 23, 29a, 31, and 34 through 36 below.

24. Sulfur Compound Emissions Monitoring and Recordkeeping.

The Permittee shall monitor and keep records as follows:

24.1 For EU IDs ~~8, 14, 29a through 33a, 35~~ 30a, 32a, 33a, and 37, comply with Condition 18 by complying with the fuel requirement in Condition 46 and keep receipts that specify the fuel grade delivered.

~~24.2 For each shipment of fuel for EU IDs 9, 22, 23, 34, and 36:~~

~~a. If the fuel grade requires a sulfur content 0.5 percent by weight or less, keep receipts that specify fuel grade and amount.~~

25. Sulfur Compound Emissions Reporting. The Permittee shall report as follows:

25.1 For EU IDs ~~8, 14, 29a through 33a, 35~~ 30a, 32a, 33a, and 37, report in accordance with Condition 99 if the sulfur content of the fuel exceeds the limit specified in Condition 46.

25.2 Include the records described in Conditions 24.1 ~~and 24.2a~~ in the operating report required by Condition 100 for each month covered by the report:

16) Conditions 24 and 25 and New Conditions. Per the previous comment addressing Conditions 24 and 25, please add conditions applicable to EU IDs 8, 9, 14, 22, 23, 29a, 31a, and 34 through 36 that are analogous to Conditions 24 and 25 but allow for the transition to the requirements in Condition 46 by including the phrase “Before June 9, 2021.” This requested change is consistent with the approach in Conditions 20 through 22. DU believes this approach is clearer and more specific.

X Sulfur Compound Emissions Monitoring and Recordkeeping.

Before June 9, 2020, the Permittee shall monitor and keep records as follows:

X.1 For EU IDs 8, 14, 29a, 31a, and 35, comply with Condition 18 by complying with the fuel requirement in Condition 46 and keep receipts that specify the fuel grade delivered.

X.2 For each shipment of fuel for EU IDs 9, 22, 23, 34, and 36:

a. If the fuel grade requires a sulfur content 0.5 percent by weight or less, keep receipts that specify fuel grade and amount.

Y Sulfur Compound Emissions Reporting. Before June 9, 2020, the Permittee shall report as follows:

Y.1 For EU IDs 8, 14, 29a, 31a, and 35, report in accordance with Condition 99 if the sulfur content of the fuel exceeds the limit specified in Condition 46.

Y.2 Include the records described in Conditions X.1 and X.2a in the operating report required by Condition 100 for each month covered by the report:

- 17) Condition 26. Please revise this condition to remove EU ID 37. EU ID 37 is not subject to requirements in Condition 34.

Beginning June 9, 2021, for EU IDs 8, 9, 14, 22, 23, 29a, 31a, and 34 through ~~36~~ 37, the Permittee shall demonstrate compliance with Conditions 18, 24, and 25 by complying with Condition 34.

- 18) Section 4, Conditions 31 through 36. DU is concerned that ADEC is using the integrated review process for this operating permit to incorporate the Serious PM_{2.5} Nonattainment State Implementation Plan (SIP) control measure requirements.

DU believes using the integrated review process is premature because the United States Environmental Protection Agency (EPA) has not yet approved the SIP requirements which are the basis for Conditions 31 through 36. None of the SIP requirements are included in an EPA-approved SIP. If this permit is issued, those requirements will become federally enforceable. If EPA ultimately disapproves the SIP or prepares a Federal Implementation Plan (FIP), DU could become subject to the federally enforceable requirements in Conditions 31 through 36 without the appropriate regulatory basis. DU could also become subject to conflicting or overly onerous sets of requirements. ADEC has advised DU that if the control measure requirements must be revised, ADEC would revise the underlying minor permit (AQ1121MSS04) and then amend the Title V permit. This approach would not be adequate or timely to avoid or mitigate the concerns addressed in this comment.

Conditions 32 and 33, specifically, require significant capital expenditure to design and construct the dry sorbent injection (DSI) system. The total estimated capital cost of installing and operating DSI is estimated at \$28.4 million. DU will order the DSI handling, process, and injection equipment by the end of June 2021. When the order is placed, DU will be committing an anticipated \$9.8 million toward installation of BACT on the FWA CHPP. DU is concerned that these expenditures could ultimately be unnecessary or misapplied if EPA disapproves the SIP, prepares and adopts a FIP, or takes any regulatory measures other than approving the SIP as written.

Additionally, DU is currently preparing detailed cost estimates for other SO₂ emission control technologies to address the EPA concerns with the control strategy section of the Serious SIP. The EPA stated that detailed cost estimates for Wet Flue Gas Desulfurization (WFGD), Spray Dry Absorption (SDA), and Circulating Dry Scrubbers (CDS) are needed to support the determination that Dry Sorbent Injection (DSI) is the Best Available Control Technology (BACT) for reducing SO₂ emissions from the six coal-fired boilers at the DU CHPP, and requested that DU provide this information. DU has spent more than \$100,000 and has committed other company resources in support of this effort.

EPA may not approve the proposed Title V permit because of the concerns discussed above. If EPA were to approve the Title V permit and then ultimately disapprove the SIP, then demonstrating that both actions are defensible would be difficult. As a result, the EPA and ADEC decision-making process would likely be questioned and could be subject to legal action initiated by a third party. Given this potential inconsistency, EPA may not approve a Title V permit that includes Conditions 31 through 36.

- 19) Condition 45.1. Please revise the final sentence in this condition as follows to refer to the permit condition which incorporates the cited requirement. The requirements in 40 CFR 60.4211(g) are presented in Condition 47.5. Additionally, please revise the citation to remove 40 CFR 60.4204(b), which is only applicable to non-emergency engines. The engines addressed in this condition are emergency engines.

The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in Condition 47.5 ~~40 CFR 60.4211(g)~~.

[40 CFR ~~60.4204(b)~~, 60.4205(b), 60.4202(a)(2), 60.4211(c), Subpart III]

- 20) Condition 47.3. Please revise this condition as follows to remove the last sentence. The requirement to install and configure the engine according to manufacturer specifications is addressed in Condition 45.1. The regulatory citation, 40 CFR 60.4211(a), also does not include this requirement.

Operate and maintain the stationary CI ICE according to the manufacturer's written instructions. Only change those emission-related settings that are permitted by the manufacturer. ~~Install and configure the engine according to the manufacturer's emission-related specifications.~~

- 21) Condition 47.4b. Please revise this condition as follows to specify the applicable condition.

You may operate your emergency stationary ICE for any combination of the purposes specified in 40 CFR 60.4211(f)(2)(i) through (iii) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by 40 CFR 60.4211(f)(3) counts as part of the 100 hours per calendar year allowed by this Condition 47.4b.

- 22) Condition 48. Please revise this condition as follows for clarity.

40 CFR 63 Subpart A. The Permittee shall comply with the applicable requirements of 40 CFR 63 Subpart A in accordance with the provisions for applicability of ~~Subpart A~~ in Table 8 to Subpart ZZZZ for EU IDs 9, 22, 23, 34, and 36, and in Table 10 to Subpart DDDDD for EU IDs 1 through 6.

23) Condition 49.2n. Please revise the citation as follows to include 40 CFR 63.10(e)(2)(i) which also includes the requirements.

[40 CFR 63.8(e)(5)(i) & 63.10(e)(2)(i)]

24) Condition 59.1d. Please revise this condition as follows. This requirement is from 40 CFR 63.6625(b)(1)(iv) which cites the provisions in 40 CFR 63.8(c)(1)(ii) and (c)(3). The requirements from 40 CFR 63.8(c)(3) are provided in Condition 49.2c, not 49.2h.

Ongoing operation and maintenance procedures in accordance with provisions in Conditions 49.2a and 49.2c; and

25) Condition 60.2. Please revise this condition as follows for clarity.

Submit a Notification of Intent to conduct a performance test at least 60 days before the performance test, as required in Condition 49.1c, for performance tests required by 40 CFR 63, Subpart ZZZZ.

26) Condition 62.5e. Please revise this condition as follows for clarity.

meet the requirements in Condition 62.5d and 40 CFR 63.7525(e)(1) through (4) for the steam flow monitoring system.

27) Condition 63.4d. Please revise the citation for this condition to refer to the applicable provision more precisely as follows.

[40 CFR 63.7555(b)(5), Subpart DDDDD]

28) Condition 67.1. Please revise this condition as follows. Please refer to the comment which addresses Condition 4.6.

Any average opacity, as recorded under Condition 5.1, that does not comply with Condition 1.1 is considered an exceedance. Opacity shall be measured by COMS. If any of the COMS is out of service or ~~out-of-control has failed a performance audit~~, Method 9 readings shall be taken as described in Condition 4.6.

COMMENTS: Preliminary Statement of Basis for Air Quality Operating Permit No. AQ1121TVP03

29) Page 5, AQ1121TVP01 paragraph under Title V Operating Permits. Please revise the sentence shown below to correct a typographical error.

The owner submitted a Title V renewal application ~~in on~~ November 7, 2007 and submitted a revised Title V renewal application on April 1, 2008.

30) Page 6, AQ1121TVP03 paragraph under Title V Operating Permits. DU suggests adding a statement to document that DU submitted an amendment to the renewal application on January 14, 2021. The amendment provided updated information and responded to an information request from the Department.

31) Page 9, fourth paragraph under factual basis for Conditions 1 through 9. Please revise this paragraph as follows to include a reference to the applicable regulation.

Condition 4.2 more clearly specifies the operation and maintenance requirements for the COMS required to be used on EU IDs 1 through 6, by making reference to Condition 62.5c, which specifies the operation and maintenance requirements for COMS under 40 CFR 63 Subpart DDDDD. Condition 4.5 establishes requirements for performance audits of the COMS.

32) Page 9, fifth paragraph under factual basis for Conditions 1 through 9. Please revise this paragraph accordingly based on the comment which addresses Condition 4.6. The language below is analogous to the language which appears in the Statement of Basis for Air Quality Control Permit AQ1121TVP02, Revision 2.

Condition 4.6 is not part of any Minor Permit for the stationary source or Standard Permit Condition XIII – Coal-Fired Boilers, but was added as gap filling reporting for situations where the COMS is found to be out-of-control during performance audits.

33) Page 10, first complete paragraph. This paragraph discusses compliance with the state's visible emission standard for liquid fuel-burning emissions units but appears to provide supporting language for Condition 7. Condition 7 addresses visible emissions monitoring for 7a, 7b, and 7c, which are industrial processes and not fuel-burning emissions units. Please revise this paragraph to clarify which conditions and emissions units are being addressed.

34) Page 11, last paragraph in the factual basis for Conditions 10 through 14. Please remove the second sentence as follows. The information in that sentence does not appear to be relevant.

MR&R requirements for particulate matter monitoring and recordkeeping for EU IDs 7a, 7b, and 7c are set forth in Condition 14. ~~Condition 99 requires the reporting of excess emissions, Condition 100 requires the reporting of compliance in the operating report, and Section 6 provides the general source testing requirements.~~ For EU IDs 8, 9, 14, 22, 23, 29a through 33a, and 34 through 37, particulate matter monitoring is only required if the units exceed the operating threshold in Conditions 2.2 and 29. Conditions 15 through 17 contain the particulate matter MR&R requirements for these units.

- 35) Page 11, Factual basis for Conditions 18 through 25. Please revise the factual basis for coal fuel as follows to account for the differences from Standard Permit Condition XIII – Coal-Fired Boilers.

Condition 19 incorporates Condition 4.1 from Minor Permit AQ1121MSS01 requiring EU IDs 1 through 6 to burn only coal.

Under Condition 20, the coal's sulfur content is measured as weight percent sulfur. If the weight percent of sulfur is not available, the Permittee is required to analyze the coal using an appropriate test method. If the coal contains more than 0.4 percent sulfur by weight, the Permittee is required to calculate the three-hour exhaust gas SO₂ concentration in accordance with Condition 20.

Conditions 21 and 22 include the recordkeeping and reporting requirements for the Coal-Fired Boiler Sulfur Compounds. Conditions 20 through 21 are effective until June 9, 2021. Beginning on June 9, 2021, the State Implementation Plan Requirements under Section 4 take effect.

- 36) Page 12, Factual basis for Conditions 18 through 25. Please revise the factual basis for liquid fuels as follows to account for the differences from Standard Permit Condition XI – SO₂ Emissions From Liquid Fuel-Burning Equipment by adding the following statement.

Conditions 24 and 25 are effective until June 9, 2021 for EU IDs 8, 9, 14, 29a, 31a, and 34 through 36. Beginning on June 9, 2021 the State Implementation Plan Requirements under Section 4 take effect.

- 37) Page 14, Paragraph 4. Please revise as follows. EU IDs 1 through 6 are not subject to any NSPS requirements.

Conditions 37.4 through 37.6 - The requirements to notify the EPA and the Department of the date of a continuous monitoring system performance demonstration, no less than 30 days before demonstration commences (40 CFR 60.7(a)(5) – (7)) are applicable to EU IDs 7a, 7b, and 7c ~~1 through 6~~ only if a CMS is installed as an NSPS requirement, which is not the case for this source.

- 38) Page 15, Factual Basis for Condition 43. Please revise as follows to correct a typographical error.

This condition incorporates Subpart Y opacity requirements. An initial source test was required by 40 CFR 60 Subpart A and has been completed. Monitoring and reporting ~~is~~ are required in accordance with Condition 43.1.

ADDITIONAL COMMENTS: DU appreciates ADEC efforts in preparing this Title V permit renewal. While the preceding comments are substantive in nature, the following comments address more minor issues which alone would not have resulted in DU submitting comments on this preliminary permit.

Preliminary Air Quality Operating Permit No. AQ1121TVP03

39) Condition 11. Please revise to correct a typographical error by adding a period at the end of the statement.

40) Condition 12.3c. Please revise to include “and” at the end of the statement.

41) Condition 13.1b. Please revise to include “or” at the end of the statement.

42) Condition 18. Please revise for consistency with Standard Permit Condition XI.1 – SO₂ Emissions from Liquid Fuel-Burning Equipment.

Sulfur Compound Emissions. The Permittee shall not cause or allow sulfur compound emissions, expressed as sulfur dioxide (SO₂), from EU IDs 1 through 6, 8, 9, 14, 22, 23, 29a through 33a, and 34 through 37 to exceed 500 parts per million (ppm) averaged over ~~a period of~~ three hours.

43) Condition 32.2. Please revise to remove the periods in “C.F.R.” for consistency with the rest of the document.

44) Condition 49.1. Please revise the citation for this condition as follows for consistency with the formatting in similar condition citations.

[40 CFR 63.7, Subpart A]
[40 CFR ~~63.7~~, 63.6665 & Table 8 to 40 CFR 63, Subpart ZZZZ]

45) Condition 49.1a. Please revise the citation for this condition as follows for consistency with the formatting in similar condition citations.

[40 CFR 63.7(a)(2), Subpart A]

46) Condition 49.2. Please revise the citation for this condition as follows for consistency with similar citations.

[40 CFR 63.6665 & Table 8 to ~~40 CFR 63~~, Subpart ZZZZ]

47) Condition 49.2l(ii). Please revise the citation for this condition as follows to correct a typographical error by adding a space.

[40 CFR_63.8(e)(3)(i), (ii), & (iv)]

48) Condition 52.2. Please revise the citation for this condition as follows to accurately reflect the table reference.

[40 CFR 63.6625(h), 63.6602, and Table 2Cc, Item 1, Subpart ZZZZ]

49) Condition 62.5c. Please revise the citation for this condition as follows to correct a typographical error by removing a space.

operate and maintain each COMS according to the procedures in 40 CFR 63.7525-(c)(1) through (7);

50) Condition 62.5d. Please revise the citation for this condition as follows to correct a typographical error by removing a space.

operate and maintain each CMS (other than COMS) according to the procedures in 40 CFR 63.7525-(d)(1) through (5); and

51) Condition 71.1. Please remove the extra space at the beginning of the condition.

52) Condition 78. Please revise this condition as follows to correct a typographical error by removing a comma.

Good Air Pollution Control Practice. The Permittee shall do the following for EU IDs 51a, and 51b:

**Preliminary Statement of Basis for Air Quality Operating Permit No.
AQ1121TVP03**

53) Page 3, Table D, Table Note a. Please add a period at the end of the sentence.

54) Page 15, Legal Basis for Condition 44. Please revise to include a space between the first and second sentences.

55) Page 20, Legal Basis for Condition 76 and 77. Please add a period to the end of the final sentence to correct typographical error.