DMK *Environmental Engineering Inc.*
PO Box 461
Monticello,Utah 84535
801-278-5133 Fax 801-951-4954
Email: DMKenv@Gmail.com

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Tim DeJulis
Utah Division of Air Quality

Dear Tim,

This letter contains responses to the questions you sent to Ron Chamness via email. Your questions are repeated here and followed by the response in italics.

The individual case totals presented in several places in the abstract do not match the totals referenced in the rest of the NOI. Which version of the estimated emissions would you like us to use?

The numbers for emission rates in the introduction are wrong, the numbers in the DAQ form 1a and the appendix C are correct.

In several instances a reference to the VOC emissions from the various processes being redirected to the fuel the boilers are indicated. Could you please confirm what your intention is with this subject item?

I believe only the loading rack is proposed to be controlled by the boilers. Ron and I discussed this and he wants to keep the design as is for now. He will instruct the design engineers to take a close look into this as they work on the final detailed design. If they conclude that a carbon unit would be a better option, we will submit a NOI to change at a later date.

In the products of combustion section, you indicate that a "…SCR capable of 8 ppmdv NOx concentration." will be used. You don't offer any ammonia emissions in the summary of table values consistent with this technology. We would expect to see a value consistent with ammonia slipping past, as well as ammonia produced. What is the technological answer to this?

I did not include ammonia in the form 1a, but ammonia values are show in appendix C. On the calculation sheet for the 51 mm btu boilers a foot note explains the ammonia calculation is based on 5 ppm ammonia slip.

In the product descriptions related to NSPS applicability reference tank numbering that was later replaced with D and W in front of the numbers. Do you want the revised

numbers to appear in this position?

Please use the D & W numbering system.

In the process description we see a value of 150 MMBtu/hr for all heaters presented, but the values for the various heaters equals 156 MMBtu/hr. Which one of these do you want us to use?

The process description is wrong. There are four heaters that total 143 mm btu, and 6 boiler that total 13.5 mm btu for a grand total of 156.5 mm btu.

The summary of NSPS, NESHAP, and MACT standards do not indicate that 60 Subpart IIII or 63 Subpart ZZZZ are applicable. You realize that we do not decide this matter and these two engines are applicable to these two subparts. Could you please revise the applicability letter to determine the best possible response?

I believe we did include IIII, but missed ZZZZ.

The receipt of various crude oil materials from western Colorado could present the possibility of a substantial amount of sulfurous material in the crude. Could you please identify how this will be treated, if at all?

The plant has been designed to process low sulfur feeds. The NOI states on page 3 that "Western Colorado Sweet Crude" will be one of the feeds. The highest sulfur content of the design feeds is 0.06% by weight. The steel used in some of the units is not capable of resisting corrosion from higher sulfur feed. Based on this, the operators will need to be selective in the feed they accept into the plant.

I have attached to this email a PDF document that is a corrected version of the NOI based on your comments. Thanks, and let me know if you need anything else.

Sincerly,

David Kopta

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