State of Utah

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Department of
Environmental Quality

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Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

DAQE-IN116640008-21

November 24, 2021

Miguel Cibrian
Delta Air Lines Incorporated
3624 West 510 North
Salt Lake City, UT 84116
Miguel.Cibrian@delta.com

Dear Mr. Cibrian:

Re: Intent to Approve:
Minor Modification to DAQE-AN116640006-14 to Add a Parts Washer and Remove Equipment
Project Number: N116640008

The attached document is the Intent to Approve (ITA) for the above-referenced project. The ITA is subject to public review. Any comments received shall be considered before an Approval Order (AO) is issued. The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final AO.

Future correspondence on this ITA should include the engineer's name, **Dylan Frederick,** as well as the DAQE number as shown on the upper right-hand corner of this letter. Dylan Frederick, can be reached at (385) 306-6529 or dfrederick@utah.gov, if you have any questions.

Sincerely,

Alan D. Humpherys, Manager
New Source Review Section

ADH:DF:sb

cc: Salt Lake Valley Health Department

STATE OF UTAH
Department of Environmental Quality
Division of Air Quality

INTENT TO APPROVE
DAQE-IN116640008-21
Minor Modification to DAQE-AN116640006-14 to Add a Parts Washer and Remove Equipment

Prepared By
Dylan Frederick, Engineer
(385) 306-6529
dfrederick@utah.gov

Issued to
Delta Air Lines Incorporated - Delta Air Lines at SLC Int'l Airport

Issued On
November 24, 2021

New Source Review Section Manager
Alan D. Humpherys

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GENERAL INFORMATION

CONTACT/LOCATION INFORMATION

Owner Name
Delta Air Lines Incorporated

Source Name
Delta Air Lines Incorporated - Delta Air Lines at SLC Int'l Airport

Mailing Address
3624 West 510 North
Salt Lake City, UT 84116

Physical Address
Department 110 AMF Box 22003 Salt Lake City International Airport
Salt Lake City, UT 84122

Source Contact
Name Miguel Cibrian
Phone (801) 647-7706
Email Miguel.Cibrian@delta.com

UTM Coordinates
417,472 m Easting
4,514,888 m Northing
Datum NAD83
UTM Zone 12

SIC code 4512 (Air Transportation, Scheduled)

SOURCE INFORMATION

General Description
Delta Air Lines Incorporated (Delta) operates a ground support equipment (GSE) maintenance facility at the Salt Lake City International Airport. Operations at this facility include vehicle cleaning and washing in the wash bay, vehicle repairs, welding, grinding, oxy-fuel cutting, parts washing, and other processes related to the upkeep of Delta's GSE fleet.

NSR Classification
Minor Modification at Minor Source

Source Classification
Located in Salt Lake City CO Maintenance Area, Northern Wasatch Front O3 NAA, Salt Lake City UT $PM_{2.5}$ NAA, Salt Lake County SO_2 NAA
Salt Lake County
Airs Source Size: B

Applicable Federal Standards
MACT (Part 63), A: General Provisions
MACT (Part 63), ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Project Description
Delta has requested the addition of a solvent parts washer to the approval order. In addition, Delta has decommissioned several emission units, which will be removed from the permit. The PTE was reevaluated as a result. The following equipment was removed:

1. Non-aerospace paint booth and associated operations
2. Emergency generator #3
3. Two (2) 20,000-gallon glycol storage tanks
4. Two (2) cold cleaners
5. Two (2) natural-gas heated cold cleaners

SUMMARY OF EMISSIONS

The emissions listed below are an estimate of the total potential emissions from the source. Some rounding of emissions is possible.

Criteria Pollutant	Change (TPY)	Total (TPY)
CO_2 Equivalent	-133	12156.00
Carbon Monoxide	-1.11	12.83
Nitrogen Oxides	-4.51	33.20
Particulate Matter - PM_{10}	-0.32	2.60
Particulate Matter - $PM_{2.5}$	-0.32	2.60
Sulfur Dioxide	-0.27	1.66
Volatile Organic Compounds	-0.90	33.93

Hazardous Air Pollutant	Change (lbs/yr)	Total (lbs/yr)
Total HAPs (CAS #THAPS)	0	14000
	Change (TPY)	**Total (TPY)**
Total HAPs	0	7.00

PUBLIC NOTICE STATEMENT

The NOI for the above-referenced project has been evaluated and has been found to be consistent with the requirements of UAC R307. Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an AO by the Director.

A 30-day public comment period will be held in accordance with UAC R307-401-7. A notification of the intent to approve will be published in the Salt Lake Tribune on November 28, 2021. During the public comment period the proposal and the evaluation of its impact on air quality will be available for the public to review and provide comment. If anyone so requests a public hearing within 15 days of publication, it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated. The proposed conditions of the AO may be changed as a result of the comments received.

SECTION I: GENERAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

I.1	All definitions, terms, abbreviations, and references used in this AO conform to those used in the UAC R307 and 40 CFR. Unless noted otherwise, references cited in these AO conditions refer to those rules. [R307-101]
I.2	The limits set forth in this AO shall not be exceeded without prior approval. [R307-401]
I.3	Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved. [R307-401-1]
I.4	All records referenced in this AO or in other applicable rules, which are required to be kept by the owner/operator, shall be made available to the Director or Director's representative upon request, and the records shall include the two-year period prior to the date of the request. Unless otherwise specified in this AO or in other applicable state and federal rules, records shall be kept for a minimum of two (2) years. [R307-401-8]
I.5	At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded. [R307-401-4]
I.6	The owner/operator shall comply with UAC R307-107. General Requirements: Breakdowns. [R307-107]
I.7	The owner/operator shall comply with UAC R307-150 Series. Emission Inventories. [R307-150]
I.8	The owner/operator shall submit documentation of the status of construction or modification to the Director within 18 months from the date of this AO. This AO may become invalid if construction is not commenced within 18 months from the date of this AO or if construction is discontinued for 18 months or more. To ensure proper credit when notifying the Director, send the documentation to the Director, attn.: NSR Section. [R307-401-18]

SECTION II: PERMITTED EQUIPMENT

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

II.A THE APPROVED EQUIPMENT

II.A.1	**Delta Air Lines** Salt Lake City International Airport maintenance operations

II.A.2	**Water Pump Engines** Eight (8) emergency water pump engines, each rated at 292 hp
II.A.3	**Emergency Generator #1** One (1) engine rated at 390 hp
II.A.4	**Emergency Generator #2** One (1) engine rated at 300 kW (402 hp) Location - Reservation Office Building Manufacturer/Model No. - Caterpillar 3406TA Max. power output - 300 kW (402 hp) Fuel - #2 Diesel fuel and/or Jet-A Max. fuel consumption - 22.7 gal/hr
II.A.5	**Cold Cleaners** Six (6) cold cleaning baths
II.A.6	**Electricity-Heated cold Cleaner** One (1) electricity-heated cleaner for cleaning miscellaneous parts
II.A.7	**One (1) Natural Gas-Fired Hot Water Boiler** Manufacturer - Cleaver-Brooks Model - CB-700-250 Maximum design rate - 10.5 MMBtu/hr Operating schedule - 24 hrs/day, 365 days/yr Installed on November 16, 1988
II.A.8	**Water Heaters** Miscellaneous water heaters each rated below 5 MMBtu/hr
II.A.9	**Storage Tanks** Two (2) glycol storage tanks Type - horizontal fixed roof storage tanks Volume - 20,000 gal. each Size - diameter: 12 ft; length: 30ft
II.A.10	**Storage Tanks** Two (2) glycol deicing/anti-icing fluid storage tanks with a capacity of 6,000 gallons each
II.A.11	**Solvent Parts Washer** One (1) aqueous solvent parts washer Model numbers or brand names mentioned are for identification purposes only.

SECTION II: SPECIAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

II.B REQUIREMENTS AND LIMITATIONS

II.B.1	**Site-Wide Requirements and Limitations**
II.B.1.a	The owner/operator shall not allow visible emissions to exceed the following values: A. Boiler stack - 10% opacity B. All diesel engines - 20% opacity C. All other points - 20% opacity. [R307-401-8]
II.B.1.a.1	Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9. [40 CFR 60, R307-401-8]
II.B.1.b	The owner/operator shall comply with all applicable requirements of R307-335 "Degreasing". [R307-335]
II.B.1.c	The owner/operator shall comply with all applicable requirements of R307-355 "Aerospace Manufacture and Rework Facilities.". [R307-355]
II.B.2	**Emergency Engine Requirements**
II.B.2.a	The owner/operator shall not operate each emergency engine or fire pump engine on site for more than 100 hours per rolling 12-month period during non-emergency situations. There is no time limit on the use of the engines during emergencies. [40 CFR 60 Subpart ZZZZ, R307-401-8]
II.B.2.a.1	The owner/operator shall: A. Determine hours of operation by maintenance records, which shall be kept on site; B. Use a non-resettable run-time meter to monitor the operating hours for Emergency Generator #2 at the reservation office building; C. Use the hours of operation to calculate a new rolling 12-month total by the 20th day of each month using data from the previous 12 months; and D. Keep hours of operation records for all periods the plant is in operation. [40 CFR 60 Subpart ZZZZ, R307-401-8]
II.B.3	**VOC & HAP Requirements**
II.B.3.a	The owner/operator shall not emit more than the following from evaporative sources (painting, printing, coating, and/or cleaning) on site: 33.93 tons per rolling 12-month period of VOCs 7.00 tons per rolling 12-month period of all HAPs combined. [R307-401-8]

II.B.3.a.1	The owner/operator shall calculate a new 12-month total by the 20th day of each month using data from the previous 12 months. The owner/operator shall use a mass-balance method to calculate emissions from evaporative sources. The owner/operator may use the following equations with applicable units to comply with the mass-balance method: VOCs = [% VOCs by Weight/100] x [Density] x [Volume Consumed] HAP = [% HAP by Weight/100] x [Density] x [Volume Consumed] [R307-401-8]
II.B.3.a.2	The owner/operator shall use a mass-balance method to quantify any amount of VOCs and HAPs reclaimed. The owner/operator shall subtract the amount of VOCs and HAPs reclaimed from the quantities calculated above to provide the monthly total emissions of VOCs and HAPs. [R307-401-8]
II.B.3.a.3	The owner/operator shall keep records each month of the following: A. The name (as per SDS) of the VOC- and HAP-emitting material B. The maximum percent by weight of VOCs and each HAP in each material used C. The density of each material used D. The volume of each VOC- and HAP-emitting material used E. The amount of VOCs and the amount of each HAP emitted from each material F. The amount of VOCs and the amount of each HAP reclaimed and/or controlled from each material G. The total amount of VOCs, the total amount of each HAP, and the total amount of all HAPs combined emitted from all materials (in tons) [R307-401-8]
II.B.4	**Fuel Requirements**
II.B.4.a	The owner/operator shall use only natural gas as fuel for the boiler. The owner/operator shall use only diesel, kerosene and Jet A for emergency generator #1 and the fire pump engines. The owner/operator shall use only diesel #2 and/or Jet-A for the emergency generator #2 at the reservation office building. [R307-401-8]
II.B.4.b	The sulfur content of any fuel oil or diesel burned shall not exceed 15 ppm by weight. Sulfur content shall be decided by ASTM Method D-4294-89, or approved equivalent. The sulfur content shall be tested if directed by the Director. [40 CFR 60 Subpart ZZZZ, R307-401-8]

PERMIT HISTORY

This Approval Order shall supersede (if a modification) or will be based on the following documents:

Supersedes	DAQE-AN116640006-14 dated February 5, 2014
Is Derived From	NOI dated December 18, 2020
Incorporates	Additional Information dated March 6, 2021
Incorporates	Additional Information dated May 7, 2021
Incorporates	NOI dated August 3, 2021
Incorporates	Additional Information dated November 3, 2021
Incorporates	Additional Information dated November 9, 2021

ACRONYMS

The following lists commonly used acronyms and associated translations as they apply to this document:

40 CFR	Title 40 of the Code of Federal Regulations
AO	Approval Order
BACT	Best Available Control Technology
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CDS	Classification Data System (used by Environmental Protection Agency to classify sources by size/type)
CEM	Continuous emissions monitor
CEMS	Continuous emissions monitoring system
CFR	Code of Federal Regulations
CMS	Continuous monitoring system
CO	Carbon monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent - Title 40 of the Code of Federal Regulations Part 98, Subpart A, Table A-1
COM	Continuous opacity monitor
DAQ/UDAQ	Division of Air Quality
DAQE	This is a document tracking code for internal Division of Air Quality use
EPA	Environmental Protection Agency
FDCP	Fugitive dust control plan
GHG	Greenhouse Gas(es) - Title 40 of the Code of Federal Regulations 52.21 (b)(49)(i)
GWP	Global Warming Potential - Title 40 of the Code of Federal Regulations Part 86.1818-12(a)
HAP or HAPs	Hazardous air pollutant(s)
ITA	Intent to Approve
LB/YR	Pounds per year
MACT	Maximum Achievable Control Technology
MMBTU	Million British Thermal Units
NAA	Nonattainment Area
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
NOI	Notice of Intent
NO_x	Oxides of nitrogen
NSPS	New Source Performance Standard
NSR	New Source Review
PM_{10}	Particulate matter less than 10 microns in size
$PM_{2.5}$	Particulate matter less than 2.5 microns in size
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
R307	Rules Series 307
R307-401	Rules Series 307 - Section 401
SO_2	Sulfur dioxide
Title IV	Title IV of the Clean Air Act
Title V	Title V of the Clean Air Act
TPY	Tons per year
UAC	Utah Administrative Code
VOC	Volatile organic compounds