

**Exh. DCG-18  
Docket UE-190882  
Witness: David C. Gomez**

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PUGET SOUND ENERGY,**

**Respondent.**

**DOCKET UE-190882**

**EXHIBIT TO  
TESTIMONY OF**

**David C. Gomez**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*Excerpts from 2018 Second Qtr. MATS Filterable Particulate Matter (FPM)  
Test Report Colstrip Units 3 & 4*

**January 10, 2020**



Stephen J. Christian • Manager, Environmental Compliance • Talen Energy, LLC  
PO Box 38 • Colstrip, MT 59323  
(406) 748-5019 • Stephen.Christian@TalenEnergy.com

Exh. DCG-18  
Docket UE-190882

August 20, 2018

Mr. Hoby Rash  
Air Compliance Section  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

RE: 2018 Second Quarter MATS Filterable Particulate Matter (FPM) Test Report  
Colstrip Units 3 & 4

Dear Mr. Rash:

Please find enclosed the Test Report for Colstrip Units 3 and 4 for MATS filterable particulate matter (FPM) tests performed during the Second Quarter 2018. Results from these tests were used to update correlation curves for the PM monitors on Colstrip Units 3 and 4.

This report contains all calibrations, sampling data, lab analyses data, and calculations required by 40 CFR 60, Appendix A, Reference Methods 1-5, to determine particulate emissions from new source fossil fuel-fired steam generators.

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. I certify that the statements and information are to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

We trust that this report satisfies your needs, however if any questions arise, please contact me at your earliest convenience.

Sincerely,

Stephen J. Christian  
Manager, Environmental Compliance

cc: w/attachment - Bob Gallagher - Region 8 EPA, Helena  
ecc: John Raty - MDEQ, Billings  
David Millegan / OnBase

w/o attachment - Gordon Criswell / Neil Dennehy / Jim Parker

**Talen Montana LLC  
Colstrip Steam Electric Station  
Environmental Compliance Department**

**Montana Air Quality Permit #OP0513-13**

**Colstrip Steam Electric Station  
Units 3 & 4  
2018 2<sup>nd</sup> Quarter MATS Test Report  
Filterable Particulate Matter (FPM)**

**June 2018**

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## **APPENDIX E**

### Notifications of Intent to Test and Correspondence

**Millegan, David R**

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**From:** Millegan, David R  
**Sent:** Thursday, April 19, 2018 9:04 AM  
**To:** 'jraty@mt.gov'; 'gallagher.bob@epa.gov'; 'loiacono.sara@epa.gov'  
**Cc:** Christian, Stephen J; Criswell, Gordon D  
**Subject:** CSES 2018 2nd Quarter MATS Compliance Testing Schedule Ltr  
**Attachments:** CSES 2018 2nd Quarter MATS Compliance Testing Schedule Ltr.pdf

To All,

Please find attached a copy of the CSES 2018 2nd Quarter MATS Compliance Testing Schedule for CSES Units 3 & 4. Hardcopies of this letter are being placed in the U.S. Mail today. If you have any questions, please give me a call or send me an e-mail. Thank you for your assistance.



**David Millegan** • Senior Compliance Professional  
Environmental Compliance Department • (406) 748-5346 •  
[David.Millegan@talenergy.com](mailto:David.Millegan@talenergy.com)  
Talen Energy Colstrip SES • P.O. Box 38 • Colstrip, MT 59323



Stephen J. Christian • Manager, Environmental Compliance • Talen Montana, LLC  
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April 19, 2018

Mr. Dan Walsh  
Air Compliance Section  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

RE: 2018 Plant 2<sup>nd</sup> Qtr MATS Particulate Compliance Testing  
Colstrip Units 3 & 4  
Talen Montana

Dear Mr. Walsh:

Listed in the table below is the proposed schedule for the 2018 Second Quarter Particulate Compliance testing on Colstrip Steam Electric Station (CSES) Units 3 & 4. It is anticipated that CSES Units 1 & 2 will be offline for the entirety of the Second Quarter.

Date	Unit	Test
6/5/18	3	Particulate Compliance
6/7/18	4	Particulate Compliance

Talen Montana Environmental Compliance Department personnel will be performing all Particulate Compliance testing activities utilizing the methods specified in our CEMS/QA Plan, the Talen Montana Source Test Protocol, and the Talen Montana AETB Manual as appropriate.

This letter is intended to satisfy the notification requirements of 40 CFR 63 10030(d), 40 CFR 60.8(d) and the MDEQ Compliance Source Testing Protocol. I will keep you apprised of any changes in plans. Please contact me at your convenience with any questions or comments.

Sincerely,

David R. Millegan,  
Senior Environmental Compliance  
Professional

cc: Bob Gallagher – Region 8 US EPA, Helena  
Sara Loiacono – Region 8 US EPA, Denver  
ecc: John Raty – MDEQ, Billings  
David Millegan/FileNet



David R Millegan • Sr. Environmental Compliance Professional • Talen Montana, LLC  
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May 23, 2018

Mr. Hoby Rash  
Air Compliance Section  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

RE: 2018 Plant 2<sup>nd</sup> Qtr MATS Particulate Compliance Testing, Rev.1  
Colstrip Units 1-4  
Talen Montana

Dear Mr. Rash:

Please find below our revised tentative schedule for the 2018 Second Quarter Particulate Compliance testing on Colstrip Steam Electric Station (CSES) Units 1-4. In early April, it was anticipated that CSES Units 1 & 2 would be offline for the entire Second Quarter. However, a change in economic conditions may necessitate bringing Units 1&2 on-line towards the end June. If either Unit 1 or Unit 2's operations are greater than 168 hours we will conduct MATS particulate compliance test(s).

Date	Unit	Test
6/5/18	3	Particulate Compliance
6/7/18	4	Particulate Compliance
6/26/18	1	Particulate Compliance
6/28/18	2	Particulate Compliance

Talen Montana Environmental Compliance Department personnel will be performing all Particulate Compliance testing activities utilizing the methods specified in our CEMS/QA Plan, the Talen Montana Source Test Protocol, and the Talen Montana AETB Manual as appropriate.

This letter is intended to satisfy the notification requirements of 40 CFR 63.10030(d), 40 CFR 60.8(d) and the MDEQ Compliance Source Testing Protocol. I will keep you apprised of any changes in plans. Please contact me at your convenience with any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "David R. Millegan".

David R. Millegan,  
Sr. Environmental Compliance Professional

cc: Bob Gallagher – Region 8 US EPA, Helena  
Sara Lolocono – Region 8 US EPA, Denver  
ecc: John Raty – MDEQ, Billings  
Steve Christian/David Millegan/OnBase



**Millegan, David R**

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**From:** Millegan, David R  
**Sent:** Friday, June 01, 2018 9:51 AM  
**To:** 'jraty@mt.gov'  
**Cc:** Christian, Stephen J; Criswell, Gordon D; Hensleigh, Shane; Dennehy, Neil J  
**Subject:** CSES Units 3 & 4 Quarterly MATS Particulate Compliance Testing

John

As a result of projected power market conditions through next week, we will not be able to attain the required 90% of full load conditions necessary for performing the Quarterly MATS Particulate Compliance Testing on CSES Units 3 & 4 originally scheduled for June 5<sup>th</sup> and 7<sup>th</sup> respectively. We will be shifting these test dates to later in the month when it is anticipated that the market conditions will be more favorable and allow the units to operate at full load conditions. Additionally, CSES Unit 1 is scheduled to return to service on June 25<sup>th</sup>. As a result, CSES Unit 1 will not operate for more than 168 hours in the Quarter and therefore is not subject to the Quarterly MATS Particulate Testing requirements. CSES Unit 1 will be removed from the proposed testing schedule. Please see the table below for the revisions in RED. If you have any questions, please give me a call or send me an e-mail. Thank you for your assistance.

Date	Unit	Test
6/5/18	3	Particulate Compliance
6/7/18	4	Particulate Compliance
6/26/18	4	Particulate Compliance
6/21/18	3	Particulate Compliance
6/26/18	4	Particulate Compliance
6/28/18	2	Particulate Compliance



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**Millegan, David R**

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**From:** Millegan, David R  
**Sent:** Wednesday, June 27, 2018 3:24 PM  
**To:** 'jraty@mt.gov'  
**Cc:** Christian, Stephen J; Criswell, Gordon D  
**Subject:** CSES Unit 2 Second Quarter Particulate Compliance Test Cancellation

John,

We will be cancelling the CSES Unit 2 Second Quarter Particulate Compliance test being that the unit did not operate for more than 168 hours in the Second Quarter (Please see attached table). The unit was recently taken offline to repair a steam leak on a main turbine control valve. It is not anticipated that CSES Unit 2 will return to service before the end of the Second Quarter due to economic reasons. If you have any questions, please give me a call or send me an e-mail. Thank you for your assistance.

Date	Unit	Test
6/21/18	3	Particulate Compliance
6/26/18	4	Particulate Compliance
6/28/18	2	Particulate Compliance



**David Millegan** • Senior Compliance Professional  
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Talen Energy Colstrip SES • P.O. Box 38 • Colstrip, MT 59323

## **APPENDIX F**

### Coal Analyses

Weighted Average BTU for Units 3 & 4 (As Delivered Coal Report)											
Date	Shift	Btu Per Pound -----		A&MF		% Moist		Ash % -----		Sulphur % -----	
		Received	Dry	Dry		Received	Dry	Received	Dry	Received	Dry
6/21/2018	2	8701	11579	13105	24.85	8.75	11.65	0.62	0.83		
6/21/2018	3	8645	11592	13101	25.42	8.59	11.52	0.60	0.81		
6/25/2018	2	8452	11455	13117	26.22	9.35	12.67	0.70	0.95		
6/25/2018	3	8444	11553	13162	26.91	8.94	12.23	0.71	0.98		
6/27/2018	3	8385	11352	13050	26.13	9.61	13.01	0.90	1.22		