

## Department of Environmental Quality

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John Corra, Director

To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.

September 5, 2008

Mr. Jude Rolfes Senior Vice President of Operations Medicine Bow Fuel & Power, LLC 2 Riverway, Suite 1780 Houston, TX 77056

Re:

Permit Application AP-5873 Medicine Bow IGL Plant

Dear Mr. Rolfes:

The Wyoming Air Quality Division has reviewed comments submitted during the public notice and public hearing for the Medicine Bow IGL Plant and is requesting additional information from Medicine Bow Fuel & Power, LLC (MBFP) regarding potential ozone impacts and normal startup emissions from the proposed Medicine Bow IGL Plant.

Given that the Medicine Bow IGL Plant is a significant source for ozone (i.e., VOC emissions are over 40 tpy) and the permit application did not address potential ozone impacts, the Division requests that MBFP provide additional information to address ozone impacts from the proposed project.

Medicine Bow Fuel & Power, LLC provided startup emissions for the plant resulting from initial commissioning activities (cold startup emissions). These emissions are not considered for PSD applicability based on EPA policy. However, emissions from the plant during routine operations including normal startup emissions (those emissions that would occur with any startup) are considered for applicability under PSD. Given that SO<sub>2</sub> emissions are relatively close to the significant emission rate for PSD applicability, the Division requests that Medicine Bow Fuel & Power, LLC address PSD applicability for SO<sub>2</sub> emissions from the plant during routine operations including normal startup emissions.

If you should have any questions, please feel free to contact this office.

Sincerely,

Andrew Keyfauver NSR Permit Engineer Air Quality Division

cc:

Chris Hanify File AP-5873

MEDICINE BOW EXHIBIT RR PRE-HRG MEMO

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