



Department of Environmental Quality



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

Dave Freudenthal, Governor

John Corra, Director

October 3, 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 (Division) has further reviewed comments received during the public notice and public hearing for the Medicine Bow IGL Plant, and is requesting additional information regarding the health risks associated with hazardous air pollutant (HAP) emissions from the proposed plant.

The Division requests that Medicine Bow Fuel & Power, LLC (MBFP) address several of the comments received by the Division by supplementing the project's Tier 1 inhalation risk assessment. In particular, several HAPs were not included in the Tier 1 assessment, including some pollutants that are classified as carcinogens (Earthjustice, Aug. 2008; comment #11). All HAPs listed in the permit application should be included in the Tier 1 assessment or justification should be provided for the exclusion of any HAP.

In keeping with the EPA guidance for a Tier 1 assessment, the individual hazard quotients for chronic noncancer and acute noncancer risk should be summed (Earthjustice, Aug. 2008; comment #12). If the cumulative risk exceeds 1, the applicant should conduct a more refined risk assessment or further refine the Tier 1 analysis by producing an isopleth plot that displays the extent of the area predicted to exceed the cumulative risk of 1. For cancer risk, a similar plot should be produced to identify the extent of the area that exceeds a cumulative risk of 1 per million. These plots should include an indication of residences within a three-mile radius of the proposed project.

Note that the permit application stated (page 6-34) that the nearest residence was located 3.3 km south of the plant, based on an inspection of aerial photographs. An individual (Johnson, Aug. 2008) commented that he lives at a ranch 2½ miles from the proposed plant. The Division requests that the applicant search other sources of information to more precisely locate nearby residences.

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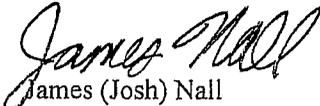
Finally, the Division received a comment that the Tier 1 inhalation risk assessment underestimates the project's health effects by not considering the additive effects of non-inhalation risks (Earthjustice, Aug. 2008; comment #11). The applicant should address this comment relative to the proposed project.

References:

1. Earthjustice (Aug. 2008), letter dated August 1, 2008; Exhibit 1
2. Johnson (Aug. 2008), letter from John Johnson dated August 4, 2008

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

Sincerely,



James (Josh) Nall
Air Quality Modeler
Air Quality Division

cc: Chris Hanify
File AP-5873