

BEFORE THE ENVIRONMENTAL QUALITY COUNCIL  
STATE OF WYOMING

In the Matter of the Appeal )  
And Petition for Review of: )  
BART Permit No. MD-6040 )  
(Jim Bridger Power Plant); and ) Docket No. 10-2801  
BART Permit No. MD-6042 )  
(Naughton Power Plant). )

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**RESPONSE TO PACIFICORP'S MOTION FOR PARTIAL SUMMARY  
JUDGMENT**

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**DEQ/AQD's Request for Add. Info., dated 8/27/09**

**EXHIBIT 15**



# 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

August 27, 2009

Mr. Bill Lawson  
Environmental Manager  
PacifiCorp Energy  
1407 W. North Temple, Suite 330  
Salt Lake City, UT 84116

Re: Response to Comments Received on BART  
Applications (AP-6040, -6041, -6042, and -6043)

Dear Mr. Lawson:

The Wyoming Air Quality Division has reviewed comments submitted during the public notice and public hearing for the Division's proposed BART determinations for the Jim Bridger (AP-6040), Dave Johnston (AP-6041), Naughton (AP-6042), and Wyodak (AP-6043) power plants and requests that PacifiCorp address the following items by close of business, Friday, September 11, 2009:

*1. Please provide supporting information that the proposed 0.07 lb/MMBtu, 30-day rolling average, NO<sub>x</sub> emission limit for SCR represents the most stringent control option.*

Referenced comments:

A) Page 2 of the National Park Service (NPS) comment letter dated August 4, 2009: NO<sub>x</sub> Step 3 - EVALUATE EFFECTIVENESS OF REMAINING CONTROL TECHNOLOGIES. The ability of SCR to reduce emissions was consistently underestimated. Proposed NO<sub>x</sub> limit for SCR (0.07 lb/MMBtu) is not low enough, SCR can achieve greater reductions. NPS suggests 0.06 lb/MMBtu for 30-day limit, 0.05 lb/MMBtu or lower for an annual limit.

B) Page 2 of the EPA Region 8 comment letter dated August 3, 2009: The most stringent control levels have not been evaluated for SCR. Cost effectiveness is overestimated as a result.

*2. Please provide a detailed explanation of how sulfate emissions were calculated for the CALPUFF visibility modeling.*

Referenced comment:

A) Page 4 of the NPS comment letter dated August 4, 2009: H<sub>2</sub>SO<sub>4</sub> Emissions.

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AQD Jim Bridger BART  
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*3. Please provide information on PacifiCorp's overall schedule for the installation of pollution control equipment and an analysis of the engineering and planning timeframe(s) used as the basis for the schedule.*

Referenced comments:

A) Page 8 of the NPS comment letter dated August 4, 2009: SCR Installation. PacifiCorp estimates that the installation of SCR requires a minimum of six years of advanced planning and engineering. The NPS cites the construction schedule for a Minnesota Power source with SCR installation taking about half the amount of time PacifiCorp estimated.

B) Page 1 of U.S. Forest Service (FS) comment letter dated July 21, 2009: SCR Installation. The FS believes that SCR installation for all four units at the Jim Bridger plant should take place by 2015-2016.

C) Page 4 of the Powder River Basin Resource Council, et al. comment letter dated August 4, 2009: SCR Installation. DEQ concluded that SCR should be installed on all four units at the Jim Bridger plant as part of a "long-term strategy" by 2023. The basis for this major extension of the BART 5-year deadline is the "logistical challenge" that PacifiCorp faces in upgrading its power plants to meet regional haze requirements. No facts supporting the extension are provided.

D) Page 6 of the EPA Region 8 comment letter dated August 3, 2009: If a 0.07 lb/MMBtu NO<sub>x</sub> emissions level is achievable by Jim Bridger Units 1 & 2 with SCR, it needs to be set as a BART limit rather than postponed under reasonable progress.

*4. Please provide additional justification for the proposed LNB with OFA NO<sub>x</sub> limit of 0.26 lb/MMBtu, 30-day rolling average, at the Jim Bridger and Naughton plants.*

Referenced comments:

A) Page 4 of the Powder River Basin Resource Council, et al. comment letter dated August 4, 2009: Presumptive BART Limit for NO<sub>x</sub>. DEQ determined BART limits of 0.26 lb/MMBtu for the four boilers at the Jim Bridger plant, but the presumptive limit is only 0.15 lb/MMBtu. DEQ's permit analysis does not present objective proof that the company is not burning sub-bituminous coal and therefore not required to meet the presumptive level.

B) Page 5 of the EPA Region 8 letter dated August 3, 2009: Presumptive BART Limit for NO<sub>x</sub>. Not enough information has been presented to explain why the proposed BART NO<sub>x</sub> limits for the Jim Bridger plant exceed the presumptive BART limits. Jim Bridger should be able to achieve lower limits closer to the presumptive levels given that two units (2 & 3) are already achieving 0.22 lb/MMBtu.

C) Page 6 of FS comment letter dated July 21, 2009: Presumptive BART Limit for NO<sub>x</sub>. PacifiCorp's analysis of coal composition is flawed and it does not meet the requirement for a demonstration of why presumptive limits cannot be reached.

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*5. Please provide information on potential installation of additional NO<sub>x</sub> control equipment at the Dave Johnston and Wyodak plants.*

Referenced comment:

A) Pages 9 and 10 of the Powder River Basin Resource Council, et al. comment letter dated August 4, 2009: SCR for Dave Johnston Units 3 and 4 and Wyodak. Because the proposed NO<sub>x</sub> controls will meet presumptive BART limits, DEQ should require SCR as part of the agency's long-term strategy.

*6. Please provide information on potential installation of additional NO<sub>x</sub> control equipment at the Naughton plant.*

Referenced comments:

A) Page 12 of the Powder River Basin Resource Council, et al. comment letter dated August 4, 2009: SCR for Naughton Units 1 and 2. DEQ should require SCR on Units 1&2 at Naughton within the next five years with emissions meeting at least the presumptive BART limits (0.15 lb/MMBtu), because the plant is causing regional haze and reasonably attributable visibility impairment.

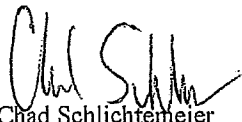
B) Page 7 of FS comment letter dated July 21, 2009: SCR at the Naughton Plant for Reasonable Progress. The FS requests clarification as to why Naughton Units 1 and 2 are not required to install SCR as part of reasonable progress like other PacifiCorp units.

In addition to the six items above, PacifiCorp is welcome to address any received comments you deem appropriate. Additional responses are also due by close of business Friday, September 11, 2009.

On August 11, 2009 a transmittal letter and a CD containing electronic copies of BART comments received from the National Park Service, the Forest Service, EPA Region 8, and Powder River Basin Resource Council et. al. were sent to PacifiCorp. An August 5, 2009 letter from the Powder River Basin Resource Council was not available for transmittal at that time. A hard copy of the letter is attached for your reference.

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

Sincerely,



Chad Schlichtemeier  
NSR Program Manager  
Air Quality Division

attach: August 5, 2009, Powder River Basin Resource Council letter

cc: Chris Hanify, Tanner Shatto, Greg Meeker, Tony Hoyt  
Files: AP-6040, AP-6041, AP-6042, AP-6043

AQD Jim Bridger BART  
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