

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).)

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

Permit MD-6040, dated 12/31/09

EXHIBIT 20



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

December 31, 2009

Mr. Robert Arambel
Managing Director
PacifiCorp
P.O. Box 158
Point of Rocks, WY 82942

Permit No. **MD-6040**
(BART Permit for the Jim Bridger Plant)

Dear Mr. Arambel:

The Division of Air Quality of the Wyoming Department of Environmental Quality has completed final review of PacifiCorp's application for a Best Available Retrofit Technology (BART) permit for four existing 530-megawatt (MW) coal-fired boilers at the Jim Bridger Power Plant. The Jim Bridger Plant is located in Section 3, T20N, R101W; approximately four miles north of Point of Rocks in Sweetwater County, Wyoming.

Following the Division's proposed approval of the permit as published June 3, 2009, a 63-day public notice period ran from June 3, 2009 to August 4, 2009, and a public hearing was held on August 4, 2009, at 6 p.m. in Room 1309 at Western Wyoming Community College, located at 2500 College Drive in Rock Springs, Wyoming. Comments were received on the proposed permit and those comments have been considered by the Division in the final permit. Therefore, on the basis of the information provided to the Division, a BART permit is hereby granted pursuant to Chapter 6, Sections 2 and 9 of the Wyoming Air Quality Standards and Regulations (WAQSR) with the following conditions:

1. Authorized representatives of the Division of Air Quality be given permission to enter and inspect any property, premise or place on or at which an air pollution source is located or is being constructed or installed, for the purpose of investigating actual or potential sources of air pollution, and for determining compliance or non-compliance with any rules, standards, permits or orders.
2. All substantive commitments and descriptions set forth in the application for this permit, unless superseded by a specific condition of this permit, are incorporated herein by this reference and are enforceable as conditions of this permit.
3. That PacifiCorp shall modify their Operating Permit in accordance with Chapter 6, Section 9(e)(vi) and Chapter 6, Section 3 of the WAQSR.
4. All notifications, reports and correspondence associated with this permit shall be submitted to the Stationary Source Compliance Program Manager, Air Quality Division, 122 West 25th Street, Cheyenne, WY 82002 and a copy shall be submitted to the District Engineer, Air Quality Division, 510 Meadowview Drive, Lander, WY 82520.

Herschler Building • 122 West 25th Street • Cheyenne, WY 82002 • <http://deq.state.wy.us>

ADMIN/OUTREACH (307) 777-7937 FAX 777-3610	ABANDONED MINES (307) 777-6145 FAX 777-6462	AIR QUALITY (307) 777-7391 FAX 777-5616	INDUSTRIAL SITING (307) 777-7369 FAX 777-5973	LAND QUALITY (307) 777-7756 FAX 777-5864	SOLID & HAZ. WASTE (307) 777-7752 FAX 777-5973	WATER QUALITY (307) 777-7781 FAX 777-5973
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AQD Jim Bridger BART
002785

5. Effective upon completion of the performance tests to verify the emission levels below, as required by Condition 6 of this permit, emissions from Jim Bridger Units 1 through 4 shall not exceed the levels below. The NO_x limits shall apply during all operating periods. PM/PM₁₀ lb/hr and tpy limits shall apply during all operating periods. PM/PM₁₀ lb/MMBtu limits shall apply during all operating periods except startup. Startup begins with the introduction of fuel into the boiler and ends no later than the point in time when two (2) pulverizers (coal mills) have been placed into service and the flue gas temperature at the inlet ducts to the electrostatic precipitator reaches a temperature of 220 °F, as defined as the average flue gas outlet temperature from the air preheaters.

Units	Pollutant	lb/MMBtu	lb/hr	tpy
2, 3, & 4	NO _x	0.26 (30-day rolling)	1,560 (30-day rolling)	6,833
1, 2, 3, & 4	PM/PM ₁₀ ^(a)	0.030	180	788

^(a) Filterable portion only

6. That no later than 90 days after permit issuance, NO_x performance tests shall be conducted on Units 2-4 and PM/PM₁₀ performance tests shall be conducted on Units 1-4 and a written report of the results be submitted. If a maximum design rate is not achieved within 90 days of permit issuance, the Administrator may require testing be done at the rate achieved and again when a maximum rate is achieved.
7. Effective upon completion of the initial performance tests to verify the emission levels below, as required by Condition 8 of this permit, emissions from Jim Bridger Unit 1 shall not exceed the levels below. The limits shall apply during all operating periods.

Pollutant	lb/MMBtu	lb/hr	tpy
NO _x	0.26 (30-day rolling)	1,560 (30-day rolling)	6,833

8. That initial NO_x performance tests shall be conducted on Unit 1 after the installation of low NO_x burners and separated overfire air in accordance with Chapter 6, Section 2(j) of the WAQSR, within 30 days of achieving a maximum design rate but not later than 90 days following initial start-up, and a written report of the results be submitted. If a maximum design rate is not achieved within 90 days of start-up, the Administrator may require testing be done at the rate achieved and again when a maximum rate is achieved.

9. Performance tests shall consist of the following:

Coal-fired boilers (Units 1 through 4):

NO_x Emissions – Compliance with the NO_x 30-day rolling average shall be determined using a continuous emissions monitoring system (CEMS) certified in accordance with 40 CFR part 60.

PM/PM₁₀ Emissions – Testing shall follow 40 CFR 60.46 and EPA Reference Test Methods 1-4 and 5.

Testing required by the Chapter 6, Section 3 Operating Permit may be submitted to satisfy the testing required by this condition.

10. Prior to any testing required by this permit, a test protocol shall be submitted to the Division for approval, at least 30 days prior to testing. Notification should be provided to the Division at least 15 days prior to any testing. Results of the tests shall be submitted to this office within 45 days of completing the tests.
11. PacifiCorp shall comply with all requirements of the Regional SO₂ Milestone and Backstop Trading Program in accordance with Chapter 14, Sections 2 and 3, of the WAQSR.
12. Compliance with the NO_x limits set forth in this permit for the coal-fired boilers (Jim Bridger Units 1-4) shall be determined with data from the continuous monitoring systems required by 40 CFR Part 75 as follows:
- a. Exceedances of the NO_x limits shall be defined as follows:
- i. Any 30-day rolling average of NO_x emissions which exceeds the lb/MMBtu limits calculated in accordance with the compliance provisions and monitoring requirements of §60.48Da and §60.49Da. The definition of “boiler operating day” shall be consistent with the definition as specified in 40 CFR part 60, subpart Da.
- ii. Any 30-day rolling average calculated using valid data (output concentration and average hourly volumetric flowrate) from the existing CEM equipment which exceeds the lb/hr NO_x limit established in this permit. Valid data shall meet the requirements of WAQSR, Chapter 5, Section 2(j) and follow the compliance provisions and monitoring requirements of §60.48Da and §60.49Da. The 30-day average emission rate shall be calculated as the arithmetic average of hourly emissions with valid data during the previous 30-day period. The definition of “boiler operating day” shall be consistent with the definition as specified in 40 CFR part 60, subpart Da.

- b. PacifiCorp shall comply with all reporting and record keeping requirements as specified in WAQSR, Chapter 5, Section 2(g) and 40 CFR part 60, subpart D. All excess emissions shall be reported using the procedures and reporting format specified in WAQSR, Chapter 5, Section 2(g).
13. PacifiCorp shall use EPA's Clean Air Markets reporting program to convert the monitoring system data to annual emissions. PacifiCorp shall provide substituted data according to the missing data procedures of 40 CFR, Part 75 during any period of time that there is not monitoring data. All monitoring data must meet the requirements of WAQSR, Chapter 5, Section 2(j).
14. Compliance with the PM/PM₁₀ limits set forth in this permit for the coal-fired boilers (Jim Bridger Units 1-4) shall be determined with data from testing for PM conducted annually, or more frequently as specified by the Administrator, following 40 CFR 60.46 and EPA Reference Test Methods 1-4 and 5. Testing required by the Chapter 6, Section 3 Operating Permit may be submitted to satisfy the testing required by this condition.
15. Records required by this permit shall be maintained for a period of at least five (5) years and shall be made available to the Division upon request.
16. PacifiCorp shall install new low NO_x burners with separated overfire air on Unit 1, in accordance with the Division's BART determination, and conduct the initial performance tests required in Condition 8 no later than December 31, 2010.
17. PacifiCorp shall submit a permit application for the installation of selective catalytic reduction (SCR) on Jim Bridger Units 3 and 4 to the Division under the Long-Term Strategy of the Wyoming §308 Regional Haze State Implementation Plan. This application shall address SCR as a system of continuous emissions reduction achieving 0.07 lb/MMBtu on a 30-day rolling average as measured by a certified CEM. SCR shall be installed and operational on Jim Bridger Unit 3 by December 31, 2015 and on Jim Bridger Unit 4 by December 31, 2016.
18. PacifiCorp shall submit a permit application for the installation of additional add-on NO_x control on Jim Bridger Units 1 and 2 to the Division no later than January 1, 2015, under the Long-Term Strategy of the Wyoming §308 Regional Haze State Implementation Plan. It shall include an analysis of the four statutory factors and the associated visibility impacts from the application of each proposed NO_x control and resulting emission levels. The application shall address each add-on NO_x control as a system of continuous emissions reduction achieving the lowest viable NO_x emission, not to exceed a maximum of 0.07 lb/MMBtu on a 30-day rolling average as measured by a certified CEM. Additional add-on NO_x control shall be installed and operational on both Jim Bridger Unit 1 and Unit 2 no later than December 31, 2023.

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Air Quality Permit MD-6040
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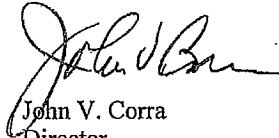
It must be noted that this approval does not relieve you of your obligation to comply with all applicable county, state, and federal standards, regulations or ordinances. Special attention must be given to Chapter 6, Section 3 of the Wyoming Air Quality Standards and Regulations, which details the requirements for compliance with condition 3. Attention must be given to Chapter 14, Sections 2 and 3 of the Wyoming Air Quality Standards and Regulations, which detail the requirements for compliance with condition 11. Any appeal of this permit as a final action of the Department must be made to the Environmental Quality Council within sixty (60) days of permit issuance per Section 16, Chapter I, General Rules of Practice and Procedure, Department of Environmental Quality.

If we may be of further assistance to you, please feel free to contact this office.

Sincerely,



David A. Finley
Administrator
Air Quality Division



John V. Corra
Director
Dept. of Environmental Quality

cc: Tony Hoyt/AQD Lander