



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 29, 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 in order to complete the response to comments.

The Division received a comment that the risk assessment of hazardous air pollutants does not, but should, include an assessment of elemental mercury and mercury compounds (Earthjustice Aug. 2008, Exhibit 2, Item 12). The Division requests Medicine Bow Fuel & Power, LLC to provide a response to this comment.

The Division received a comment regarding PM₁₀ emissions from ash (slag) handling and storage (Earthjustice Aug. 2008, Exhibit 2, Item 17). The application represents this source as having no emissions as it's not expected to become airborne. Therefore, the Division is considering establishing a no visible emission limit for the slag handling and stockpiling operation. The Division requests Medicine Bow Fuel & Power, LLC to provide an evaluation of a no visible emission limit on slag operations. If Medicine Bow Fuel & Power, LLC would not be able to demonstrate compliance with a no visible emission limit on slag operations a top-down BACT analysis for PM₁₀ emissions will need to be submitted.

Medicine Bow Fuel & Power, LLC commented that the hours of operation for the Black Start Generators should be increased to 360 hours of operation per year. The Division requests clarification as to whether the increase in operating hours is needed for a cold-start year or is needed for every year of operation of the facility. The Division is considering to keep the hours of operation of the Black Start Generators limited to 250 hours.

MEDICINE BOW EXHIBIT XX PRE-HRG MEMO

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

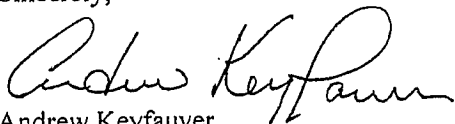
ADMIN/OUTREACH (307) 777-7937 FAX 777-3610	ABANDONED MINES (307) 777-6145 FAX 777-6462	AIR QUALITY (307) 777-7391 FAX 777-5616	INDUSTRIAL SITING (307) 777-7369 FAX 777-5973	LAND QUALITY (307) 777-7756 FAX 777-5864	SOLID & HAZ. WASTE (307) 777-7752 FAX 777-5973	WATER QUALITY (307) 777-7752 FAX 777-5973
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If you should have any questions, please feel free to contact this office.

Sincerely,

A handwritten signature in cursive script, appearing to read "Andrew Keyfauber".

Andrew Keyfauber
NSR Permit Engineer
Air Quality Division

cc: Chris Hanify
File AP-5873

DEQ 001481