

BEFORE THE ENVIRONMENTAL QUALITY COUNCIL
STATE OF WYOMING

IN THE MATTER OF:)
BASIN ELECTRICAL POWER COOPERATIVE)
DRY FORK STATION,) Docket No. 07-2801
AIR PERMIT CT-4631)

RESPONDENT DEPARTMENT OF ENVIRONMENTAL QUALITY'S
MEMORANDUM IN SUPPORT OF MOTION FOR PARTIAL SUMMARY
JUDGMENT

Schlichtemeir Affidavit

EXHIBIT J

**BASIN ELECTRIC
POWER COOPERATIVE**

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June 14, 2006

Mr. Bernard J. Dailey
NSR Program Manager
Department of
Environmental Quality
Division of Air Quality
122 W. 25th Street
Cheyenne, WY 82002



Re: Permit Application AP-3546

Dear Mr. Dailey:

Enclosed are five copies of the response to the completeness review comments dated March 28, 2006. These comments are in response to the permit application (AP-3546) submitted for the construction of the Dry Fork Station located near Gillette, Wyoming. The enclosure includes a diskette with the modeling data inputs and results which are addressed in the response.

If you have any questions, please contact me.

Sincerely,

Jerry Menge
Air Quality Project Coordinator

/gmj

enclosures

cc: Clyde Bush w/o enclosure
J.K. Miller w/o enclosure



Document Summary

BASIN ELECTRIC POWER COOPERATIVE

**DRY FORK STATION
Gillette, Wyoming**



Permit Application Number AP-3546

**Response To
Wyoming Department of Environmental Quality
Completeness Review
March 28, 2006**

**Submitted:
June 14, 2006**

**Basin Electric Power Cooperative
Dry Fork Unit 1 PSD Permit Application
Response to Wyoming Department of Environmental Quality, Air Quality Division
Permit Application No. AP-3546 Completeness Review Dated March 28, 2006**

Provided below is a detailed response to questions included in the Wyoming Department of Environmental Quality's (WDEQ) Completeness Review dated March 28, 2006. WDEQ comments are provided below in italics.

WDEQ Comment 1: *Modeling of Colstrip Units #3 and #4:*

The Class I area significance analysis for the proposed project indicated that the modeled impacts from the proposed coal-fired boiler were above the EPA proposed Class I Significant Impact levels (SILs) for sulfur dioxide (SO₂) at the Northern Cheyenne Indian Reservation (NCIR) for the 3-hour and 24-hour averaging periods. As a result, a cumulative impact analysis for SO₂ at the NCIR was submitted as part of the permit application based on the increment consuming sources identified by the State of Montana Department of Environmental Quality, which included the Colstrip facility (Unit #3 and Unit #4), in Montana.

In reviewing the permit application, the Division noted that the Colstrip Unit #3 and Unit #4 boilers were modeled using a calculated 90th percentile of the 3-hour and 24-hour block averages, based on a two-year average (2003 and 2004) of actual SO₂ emissions from these two (2) units.

Based on information received from the State of Montana Department of Environmental Quality (MDEQ) regarding the modeling analyses conducted for Colstrip Unit #3 and Unit #4, these SO₂ sources were constructed after the Minor Source Baseline Date for the NCIR of March, 1979. Since the Class I SIL analysis demonstrated that a cumulative increment analysis was required to address short-term SO₂ increment consumption at NCIR, it is the Division's position that the allowable short-term emission rates are representative of short-term actual emission rates, as a practical means to quantify short-term emission rates in a dispersion modeling analysis. Therefore, the Division will require that Unit #3 and Unit #4 at the Colstrip facility are both modeled using the short-term permitted SO₂ emission rates for these sources.

Response: Basin Electric Power Cooperative (BEPC) has conducted revised Class I cumulative SO₂ increment consumption modeling for Northern Cheyenne Indian Reservation (NCIR) in response to comments from the WDEQ. The revised modeling responds to comments received from WDEQ in their letters of December 21, 2005 and March 28, 2006.

In the letter dated December 21, 2005, WDEQ stated that the Wyodak unit should be included in cumulative SO₂ increment consumption modeling because the unit was not a pre-baseline unit as was first assumed by BEPC. WDEQ also stated that the Neil Simpson Unit 1 source was a pre-baseline source and could be removed from the modeling. In a more recent letter dated March 28, 2006, WDEQ requested that: 1) Potential to Emit (PTE) emission rates be used for the Colstrip sources in Montana, and 2) a new 2044-receptor grid that was supplied to WDEQ by Montana DEQ be used for any future modeling for NCIR.

BEPC feels that it is important to point out that the Class I cumulative SO₂ increment consumption modeling submitted in the original application is based on USEPA's policy as published in the October 1990 New Source Review Workshop Manual. Guidance in Section II.E, page C.10 of the manual states:

"Emissions increases that consume a portion of the applicable increment, in general, all those not accounted for in the baseline concentration and specifically include:

- *actual* emissions increases occurring after the major source baseline date, which are associated with physical changes or changes in the method of operation (i.e., construction) at a major stationary source; and
- *actual* emissions increases at any stationary source, area source, or mobile source occurring after the minor source baseline date."

However, as requested by WDEQ, BEPC had CH2M HILL revise the NCIR SO₂ modeling with all of the requested changes. The results of the modeling are presented in Table 1. Modeled exceedances of the 3-hour and 24-hour Class I SO₂ increment were predicted for all three years of meteorology. However, in each case, the contributions from the Dry Fork Station Project were less than the Class I modeling significance levels.

Table 1: Cumulative Modeled Class I SO₂ Increment Consumption in Northern Cheyenne Indian Reservation (µg/m³)

Year of Meteorology	Highest 2 nd -High 3-hour SO ₂	Highest 2 nd -High 24-Hour SO ₂
2001	37.8	5.2
2002	37.2	7.2
2003	38.9	5.1
Class I PSD Increment	25	5
Class Modeling Significance Level*	1.0	0.2

Notes:
 PSD = Prevention of Significant Deterioration
 µg/m³ = micrograms per cubic meter
 *Class I Modeling Significance Levels were proposed by EPA on July 23, 1996 [61 FR.38250], but were never adopted as a final rule.

WDEQ Comment 2: Receptor Grid for NCIR:

The Division originally provided a receptor grid for the NCIR Class I area, based on using a 4 kilometer (km) receptor resolution which was developed as part of a previous modeling analysis for the NCIR. In discussing with MDEQ, the current modeling analyses that have been conducted for the NCIR, the Division learned that a finer resolution receptor grid has been generated, which includes the boundary and interior area of the NCIR; this receptor grid resolution is approximately 1 km. This particular receptor grid for the NCIR was employed in the latest NCR modeling analysis using AERMOD, which was reviewed by both the MDEQ and EPA-Region VIII with respect to Class I SO₂ increment consumption at the NCIR. Therefore, the Division will require that Basin Electric utilize this same receptor grid for any further modeling

analyses at the NCIR Class I area. An electronic copy of the receptor grid file, entitled, CHEYRECS.ROU which was generated by AERMAP, is attached to this letter.

Response: The finer resolution receptor grid was used for both the revised SO₂ cumulative analysis (per WDEQ Comment 1) and the revised CALPUFF visibility modeling (see response to WDEQ Comment 3, *Revised CALPUFF Visibility Modeling*).

WDEQ Comment 3: Quantification of Condensible Particulate Emissions from Boiler:

During the Division's review of several modeling protocols for sources that have proposed coal-fired boilers, questions with regard to the quantification of condensible particulate emissions have arisen. The Division recognizes that there is a great deal of uncertainty in the quantification of condensible particulate emissions from coal-fired boilers, and in order to conduct a thorough technical review of this application, the Division will require Basin Electric to submit additional documentation which justifies the basis used to quantify condensible particulate emission rates from the boiler. Based on this additional documentation, if the calculated condensible particulate emission rates are revised from the emission rates originally submitted in the Dry Fork permit application, the Class I area modeling analyses will need to be revised and submitted to the Division.

Response: BEPC submitted an air construction permit application for the Dry Fork Generating Station on November 10, 2005 (the "Permit Application"). The Permit Application included all the information required in a Prevention of Significant Deterioration (PSD) permit application, including a Best Available Control Technology (BACT) analysis and impact modeling. A BACT analysis was prepared for each PSD pollutant, including particulate matter with an aerodynamic diameter of less than 10 microns (PM₁₀). Based on the BACT analysis, BEPC proposed the following PM₁₀ permit limits. These permit limits were used as input to the Class I modeling analyses.

- PM₁₀ (filterable) 0.012 lb/mmBtu
- PM₁₀ (total – including filterable and condensible): 0.017 lb/mmBtu.

The filterable PM₁₀ (FPM₁₀) emission limit proposed in the Permit Application was based on a comprehensive review of available control technologies, anticipated vendor guarantees, and permit limits included in other recently issued PSD permits for coal-fired boilers. The condensible PM₁₀ (CPM₁₀) emission rate was calculated based on site-specific fuel characteristics and control technology removal efficiencies.

BEPC agrees with the WDEQ's statement regarding the uncertainty in the quantification of condensible particulate emissions from coal-fired boilers. PM₁₀ emissions from coal-fired boilers have historically been measured and reported as FPM₁₀, and there is limited information available characterizing CPM₁₀ emissions from coal-fired boilers. This response includes a detailed description of the methodology used to quantify CPM₁₀ emissions from the proposed Dry Fork boiler, and provides additional documentation to justify the condensible particulate constituent emission rates used in the Class I impact modeling.

PM₁₀ Composition, Control and Measurement

PM₁₀ composition and emission levels are a complex function of boiler firing configuration, boiler operation, pollution control equipment and coal properties. Uncontrolled particulate matter emissions from coal-fired boilers include ash from coal-combustion, noncombustible metals present in trace quantities and unburned carbon resulting from incomplete combustion. In pulverized coal systems, combustion is almost complete, thus, particulate matter exiting the boiler is primarily composed of inorganic ash residues. Other sources of particulate matter may include condensable organics and minerals present in the combustion air.

PM₁₀ can be classified as either "filterable" or "condensable." Basically, FPM₁₀ is composed of solids that can be captured on a filter media, while CPM₁₀ is a gas at the sampling location, which condenses into a liquid or solid within a few seconds of leaving the stack. The terms "filterable" and "condensable" describe how the particulate matter is captured in the sampling train. FPM₁₀ is captured in the filtering media located in the front-half of the sampling train. CPM₁₀ passes through the filter media and is captured in the sampling train impinger solution.

There is limited data available regarding CPM emissions from fossil fuel combustion sources. Historically, compliance with particulate matter emission limits has been demonstrated using reference methods that involve filtration at 250 °F (EPA Method 5) or at actual stack temperatures (EPA Method 17). For example, compliance with the federal PM new source performance standard (NSPS) for electric utility steam generating units must be demonstrated using Method 5 at facilities without wet FGD systems and Method 5B after wet FGD systems (see, 40 CFR 40.48a(b)). Both methods measure FPM.

With the change of the federal ambient air quality standard for particulate matter from total particulate to PM₁₀, USEPA promulgated a series of reference methods to measure PM₁₀ emissions from stationary sources.¹ These included Methods 201 and 201A for FPM₁₀, and Method 202 for CPM₁₀. These methods do not apply to any federal emissions limits and have not been incorporated into the federal NSPS. However, some recently issued PSD permits for new coal-fired units have included PM₁₀ emission limits including both filterable and condensable particulates.

Sulfate (SO₄) compounds (e.g., sulfuric acid (H₂SO₄) mist) are the most widely recognized form of CPM emitted by combustion sources.² Sulfuric acid formed in the boiler and subsequent emission control systems (e.g., SCR and FGD) has a vapor pressure sufficiently low to condense at ambient conditions.

Beyond the H₂SO₄ component, there are limited analytical data characterizing CPM from coal-fired boilers. Other inorganic species will contribute to CPM emissions, including ammonium sulfate, other acid gases, and trace volatile metals. For example, ammonium sulfate ((NH₄)₂SO₄) will be formed when SO₂ in the flue gas reacts with free ammonia (NH₃) from the SCR control system. Trace levels of chlorine and fluorine in the coal will convert to HCl and HF gas during the combustion process, and may be captured as condensable particulates. Organic species in the flue gas may also exist as vapors at stack temperatures but condense to liquid or solid aerosols at ambient temperatures. Because pulverized coal-fired boilers are typically operated with essentially complete combustion, condensable organic emissions

¹ See, Pjetraj, M., "Condensable Particulate Matter – Regulatory History and Proposed Policy", North Carolina Department of Air Quality, January 27, 1998.

² See, Corio, L.A., Sherwell, J., "In-Stack Condensable Particulate Matter Measurements and Issues", Journal of the Air & Waste Management Association, vol. 50, February 2000, page 207.

should be very low. USEPA-sponsored evaluations of test Method 202 show that the inorganic constituents typically account for approximately 90 to 95% of the total condensible PM, with sulfate compounds, primarily H₂SO₄, accounting for most of the inorganic condensible emissions.³

USEPA's Compilation of Air Pollution Emission Factors (AP-42)⁴ includes an emission factor for CPM from pulverized coal-fired boilers equipped with FGD control (AP-42 Table 1.1-5). However, the emission factor (0.02 lb/mmBtu total CPM) does not distinguish between the inorganic and organic fractions, and has an emission factor rating of "E". An emission factor rating of "E" indicates that the factor was developed from a small number of facilities, and that there may be reason to suspect that the facilities tested do not represent a random sample of the industry.

Because there is limited information from existing sources characterizing CPM emissions, and because the AP-42 emission factor for CPM from pulverized coal-fired boilers has an "E" rating, emission calculations are typically used to estimate CPM emissions from a specific source. CPM₁₀ emission limits proposed in the Permit Application were estimated using site-specific coal characteristics, boiler operating conditions, and assumed emission control efficiencies. A summary of the CPM₁₀ constituents, and a description of the methodology used to calculate each emission rate, is provided in Table 2.

Table 2: CPM Constituents Proposed in the Original (11/10/05) Permit Application

Constituent	Emission Rate (lb/hr)	Emission Rate (lb/mmBtu)	Methodology
H ₂ SO ₄	9.50	0.0025	Sulfur content of fuel, 2% SO ₂ to SO ₃ conversion in boiler and SCR, 100% conversion of SO ₃ to H ₂ SO ₄ , and 90% control in the SDA/FF.
(NH ₄) ₂ SO ₄	1.53	0.000402	Ammonia slip of 2.0 ppmvd @ 3% O ₂ , 25% conversion of the ammonia slip to (NH ₄) ₂ SO ₄ , and 90% control in the SDA/FF
HF	2.62	0.00069	80 ppmwd fluorine in the coal, 100% conversion F to HF, 90% removal in the SDA/FF.
HCl	3.23	0.00085	100 ppmwd chlorine in the coal, 100% conversion Cl to HCl, and 90% removal in the SDA/FF
Organic Condensibles	1.88	0.00049	Organic CPM was calculated by summing the organic compounds listed in AP-42 Tables 1.1-13 (Polynuclear Aromatic Hydrocarbons from Controlled Coal Combustion) and 1.1-14 (Various Organic Compounds from Controlled Coal Combustion) with boiling temperatures of 300 °F or less.
Total	18.76	0.005	

In addition to the limitations associated with calculating CPM emissions, stack testing methodologies used to measure H₂SO₄ and CPM₁₀ (Methods 8 and 202, respectively) have proven to be problematic at coal-fired boilers. For example, interfering agents with Method 8 include fluorides and free ammonia (NH₃). Method 8 states that if "any of these interfering agents is present... alternative methods, subject

³ Method Development and Evaluation of Draft Protocol for Measurement of Condensible Particulate Emissions;

U.S. Environmental Protection Agency, Research Triangle Park, NC, 1990.

⁴ *Compilation of Air Pollution Emission Factors (AP-42)*, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards.

to the approval of the Administrator, are required.” Because of the difficulties associated with demonstrating compliance with low H₂SO₄ emission rates, equipment vendors have not been willing to guarantee H₂SO₄ emissions below approximately 2 ppmvd @ 3% O₂. Based on information from equipment vendors, an emission rate of 2 ppmvd @ 3% O₂ (approximately 0.005 lb/mmBtu), represents the practical analytical detection limit of Method 8 on a coal-fired boiler.

Likewise, Method 202 has been shown to have a false positive bias when used on sources with SO₂ and NH₃ in the flue gas, such as coal-fired boilers.⁵ In Method 202, flue gas is bubbled through water-filled impingers located downstream of the filters used to capture filterable particulates. The contents of the impingers are evaporated and the residue is weighed to determine condensible particulate emissions. The basic problem involved in using Method 202 is that the method by which condensible species are collected in the impingers differs from the method by which condensible species coalesce into particles in the stack plume. For example, gaseous species in the flue gas that would not condense in the atmosphere (e.g., SO₂ and NH₃) may be collected in the impingers and converted to particulate species in the sampling train.

As an example of this phenomenon, during sampling, a portion of the SO₂ in the sample gas (which is not a condensible species) will be dissolved in the impinger water. In the impinger sample, test data have shown that a portion of this SO₂ will oxidize to sulfate ion (SO₄²⁻) which will form sulfuric acid and be indistinguishable from true condensible particulates. Similarly, when both SO₂ and NH₃ are in the gas stream, they will both dissolve in the impingers, and have been shown to react to form either ammonium sulfate or ammonium bisulfate, which tend to oxidize to ammonium sulfate ((NH₄)₂SO₄) and ammonium bisulfate ((NH₄)HSO₄) during sample storage and handling. Gaseous SO₂ and NH₃ are not condensible species, however, ammonium sulfate and ammonium bisulfate will be measured as condensible particulates.

Because of the limited data from existing plants and limitations associated with Method 202, equipment vendors have not provided guarantees for stringent CPM emission limits. On one recent project (subbituminous-fired PC equipped with dry FGD) the most aggressive guaranteed emission rate available for total PM₁₀ (FPM and CPM) was 0.025 lb/mmBtu, conditioned upon including modifications to the CPM compliance test method. Based on recent conversations with equipment vendors, it is anticipated that the most aggressive total PM₁₀ (FPM and CPM) emission limit available for the proposed Dry Fork unit will be in the range of 0.020 to 0.025 lb/mmBtu.

PM₁₀ Emission Rate Conclusions/Recommendations

The approach used to calculate the inorganic portion of the condensible particulates, including H₂SO₄, HCl, HF, and (NH₄)₂SO₄, is consistent with the approach used in other permit applications. However, because H₂SO₄ is the major inorganic CPM constituent, and because of the limitations associated with the test method used to demonstrate H₂SO₄ compliance, BEPC has concluded that the proposed total PM₁₀ emission rate of 0.0025 lb/mmBtu was too aggressive (see, the H₂SO₄ BACT analysis prepared as part of this response, Attachment 1). Several recently proposed subbituminous-fired PC units have been permitted with the combination of dry FGD plus fabric filter as BACT for H₂SO₄ control. Units proposing this combination of controls have been permitted with controlled H₂SO₄ emission rates ranging from 0.0042 to 0.0048 lb/mmBtu (approximately 2 ppmvd @ 3% O₂). An emission rate of 2 ppmvd @

⁵ See, Corio, L.A., Sherwell, J., “In-Stack Condensible Particulate Matter Measurements and Issues”, Journal of Air & Waste Management Association, 50:207-218, February 2000.

3% O₂ is very close to the Method 8 detection limit on a coal-fired boiler. Therefore, to ensure a guarantee can be obtained for the proposed emission rate, and to ensure that Class I impacts are modeled at an emission rate that can be demonstrated with compliance testing, BEPC is proposing to increase the controlled H₂SO₄ emission rate to 17.1 lb/hr (0.0045 lb/mmBtu or approximately 2 ppmvd @ 3% O₂).

Similarly, because of the difficulties associated with quantifying organic condensibles, BEPC is also proposing to increase the organic fraction of the CPM emissions. As noted in Table 2, organic CPM was calculated based on organic constituents listed in AP-42 Tables 1.1-13 and 1.1-14 with boiling points less than 300 °F. However, all of the organic compounds listed in Tables 1.1-13 and 1.1-14 add up to an emission rate of approximately 0.0092 lb/ton. This emission rate is about 1/6th the AP-42 emission factor for total uncontrolled nonmethane organic compounds (AP-42 Table 1.1-19) of 0.06 lb/ton. Therefore, calculating condensible organic emissions using only the constituents listed in Tables 1.1-13 and 1.1-14 may underestimate organic CPM. Without more specific data, BEPC is proposing to adjust the organic CPM emission rate up such that the total PM₁₀ emission rate (filterable + condensible) equals 0.020 lb/mmBtu. An emission rate of 0.020 lb/mmBtu is equivalent to the most stringent guarantee expected to be available from emission control vendors.

A summary of the revised CPM emission rates is provided in Table 3. Class I impact modeling has been revised to be consistent with the new CPM emission rates.

Table 3: Revised CPM Constituent Emission Rates

Constituent	Emission Rate (lb/hr)	Emission Rate (lb/mmBtu)	Methodology
H ₂ SO ₄	17.1	0.0045	Sulfur content of fuel, 2% SO ₂ to SO ₃ conversion in boiler and SCR, 100% conversion of SO ₃ to H ₂ SO ₄ , and approximately 82% control in the SDA/FF. Emission rate based on limitations associated with the test method used to demonstrate compliance (Method 8).
(NH ₄) ₂ SO ₄	1.53	0.000402	Ammonia slip of 2.0 ppmvd @ 3% O ₂ , 25% conversion of the ammonia slip to (NH ₄) ₂ SO ₄ , and 90% control in the SDA/FF.
HF	2.62	0.00069	80 ppmvd fluorine in the coal, 100% conversion F to HF, 90% removal in the SDA/FF.
HCl	3.23	0.00085	100 ppmvd chlorine in the coal, 100% conversion Cl to HCl, and 90% removal in the SDA/FF.
Organic Condensibles	5.60	0.00147	Organic CPM emission rate was revised to reflect an overall PM ₁₀ emission rate (filterable + condensible) of 0.020 lb/mmBtu, which is equivalent to the most aggressive guarantee available from equipment vendors.
Total CPM ₁₀	30.1	0.008	
Total PM ₁₀	75.7	0.020	FPM ₁₀ = 0.012 lb/mmBtu

Although calculations can be used to predict CPM₁₀ emissions, there is very limited information from existing coal-fired plants characterizing actual CPM emissions that can be used to check the veracity of the emission calculations. Without sufficient data from existing plants, it is not practical to establish an enforceable CPM BACT emission limit. Therefore, BEPC is including the CPM emission rates for emission inventory purposes only, and not as an enforceable BACT emission limit. BEPC is proposing

emission control technologies, and compliance with the BACT emission limit for H_2SO_4 as BACT for CPM. H_2SO_4 is the most widely recognized form of CPM emitted by combustion sources, and control technologies designed to minimize sulfuric acid mist emissions will also minimize inorganic CPM, including other acid gases and ammonium sulfate. USEPA's Environmental Appeals Board (EAB) recently upheld the Nevada Division of Environmental Protection's (NDEP) decision to issue a PSD permit without including a specific CPM BACT emission limit. See, *In re Newmont Nevada Energy Investment, L.L.C., TS Power Plant*, PSD Appeal No. 05-04, slip opinion, December 21, 2005. The PSD permit issued by NDEP for a new coal-fired boiler included a BACT emission limit for FPM, but did not include a BACT emission limit for CPM. During the permit review process, NDEP concluded that "BACT is typically set for the filterable fraction of PM/PM_{10} only, as no technology has been identified... to control condensible PM/PM_{10} emissions from coal-fired boilers and thus it would be technically impossible to establish BACT limits for condensibles in circumstances such as these." The EAB upheld NDEP's decision to exclude a CPM BACT emission limit citing several PSD cases holding "[a]lthough BACT is defined as an 'emission limitation,' it is also, as its name implies, keyed to a specific control technology." citing *In re Hibbing Taconite Co.*, 2 E.A.D. 838, 844 (Adm'r 1989).

Revised H_2SO_4 BACT Analysis

A revised BACT analysis has been prepared to support a proposed H_2SO_4 emission limit of 17.1 lb/hr (0.0045 lb/mmBtu). This has been included as Attachment 1 to this response.

Revised Permit Emission Limits

BEPC has revised Section 6.3 of the original (11/10/05) permit application to show the requested permit limits based on the analysis in this response. This has been included as Attachment 2 to this response.

Revised Emissions Calculations Workbook

BEPC has revised the Emissions Calculations Workbook (Appendix B of the original 11/10/05 permit application) to include both the proposed changes in this response as well as the revisions made to the auxiliary equipment emissions inventory as part of the response to the WDEQ completeness letter of December 21, 2005. This workbook has been included as part of the electronic file package on the data CD attached to this response.

Revised CALPUFF Visibility Modeling

BEPC had CH2M HILL conduct revised Class I visibility modeling for Wind Cave NP, Badlands NP, and Northern Cheyenne Indian Reservation (NCIR) to account for the proposed increase in the total condensible PM_{10} (CPM) estimate. The modeling for NCIR included the new 2044-receptor grid that was supplied to BEPC by WDEQ to be used for any future modeling for NCIR. Table 4 presents a summary of the (raw) revised visibility results.

Table 4: Raw CALPUFF Visibility Results (Revised)

Area	Maximum Modeled Light Extinction	Number of Days with Percentage Change > 5%	Number of Days with Percentage Change > 10%
<u>2001</u>			
Wind Cave NP	8.6%	2	0
Badlands NP	<5%	0	0
Northern Cheyenne Indian Reservation	12.5%	3	1
<u>2002</u>			
Wind Cave NP	9.1%	2	0
Badlands NP	5.8%	1	0
Northern Cheyenne Indian Reservation	5.9%	3	0
<u>2003</u>			
Wind Cave NP	8.3%	3	0
Badlands NP	5.2%	1	0
Northern Cheyenne Indian Reservation	54.4%	1	1
Notes: NP = National Park			

The following discussion examines each instance for which the raw 24-hour visibility result exceeded 5 percent. Most of the 24-hour periods that yielded raw visibility impacts greater than 5 percent occurred on the same days as with the initial submittal for the project. Three additional days yielded raw impacts greater than 5 percent, and descriptions for those days are presented at the end of the discussion. Detailed data sheets that summarize observed weather and visibility for these days are presented as Attachment 3 to this response.

March 22, 2001: Wind Cave NP

The raw, modeled 24-hour average visibility result for this day was 8.59 percent. Transmissometer readings at nearby Badlands NP and surface meteorological observations at Rapid City indicate that pronounced natural obscuration was in place for most of the day. Observed weather at Rapid City included 19 hours of rain, mist, or fog. Visibility at Rapid City was reduced to 0.2 mile for nine hours during the 24-hour period. Hourly transmissometer readings at Badlands were greater than 50 Mm⁻¹ for 20 hours of the day, and for 13 of these hours the reading was 942 Mm⁻¹, which indicates total obscuration along the 4.15 km optical path of the instrument. Using the transmissometer data as a substitute for natural background when the hourly reading exceeded 50 Mm⁻¹, the predicted 24-hour visibility impact is reduced to 0.25 percent.

March 23, 2001: Wind Cave NP

For this day, the raw, modeled visibility impact was 5.51 percent. Transmissometer readings at nearby Badlands NP and surface meteorological observations at Rapid City indicate that the weather event of March 22 continued into the first half of March 23. Observed weather at Rapid City included 11 hours of fog, rain, mist, snow, or drizzle. Visibility at Rapid City was reduced to 0.2 mile for four hours during the first half of the day. Hourly transmissometer readings at Badlands were greater than 50 Mm^{-1} for the entire day, with five of these readings at 942 Mm^{-1} (total obscuration). Using the transmissometer reading as a substitute for natural background when the hour exceeded 50 Mm^{-1} , the predicted 24-hour visibility impact is reduced to 0.32 percent.

February 23, 2001: Northern Cheyenne Indian Reservation

The raw, modeled visibility result for this day was 12.47 percent. Surface meteorological observations at Billings, Montana and Sheridan, Wyoming indicate that a weather event is affecting the area that includes strong natural obscuration. Observed weather at Billings included 11 hours of mist, and observed weather at Sheridan included 16 hours of mist or fog. Visibility was reduced at Billings for most of the day, while visibility at Sheridan was reduced for the entire period, with a minimum of 0.2 miles for three hours. To arrive at a predicted visibility impact that accounts for natural obscuration, CH2M HILL took the measured visual range from the nearest NWS surface station (Sheridan) for hours that included obscuring weather, and converted the visual range to units of Mm^{-1} . Using the calculated extinction for the obscured hours as a substitute for natural background, the predicted 24-hour visibility impact is reduced to 0.11 percent.

April 6, 2001: Northern Cheyenne Indian Reservation

The raw, modeled visibility result for this day was 9.92 percent. Surface meteorological observations include three to four hours of thunderstorms and rain at Billings, Montana and Sheridan, Wyoming. Visibility (visual range) readings do not fall below the instrument maximum reading of 10 km at either location, but one cannot conclude from this that visibility was not reduced to some degree because the visual range on a clear day would be much higher than 10 km. A visual range of just 10 km is equivalent to an atmospheric light extinction of 391 Mm^{-1} which is well into the light scattering range due to condensed water. Therefore, even if the actual visual range is somewhat above 10 km, this still indicates natural obscuration from condensed water is occurring. If the visual range for the hour at Sheridan that included rain showers is converted to units of Mm^{-1} and substituted for natural background, the predicted 24-hour visibility impact is reduced to 6.29 percent.

October 26, 2002: Wind Cave NP

The raw, modeled visibility result for this day was 9.09 percent. Transmissometer readings at nearby Badlands NP and surface meteorological observations at Rapid City and Ellsworth AFB near Rapid City indicate that pronounced natural obscuration was in place for more than half of the day. Surface weather observations at Rapid City were missing for the first 10 hours of the day, but the weather station at nearby Ellsworth AFB observed fog for four hours during the morning. Rapid City recorded two hours of mist after the station came back on line at 1100. Visibility at Ellsworth was reduced to 0.2 mile (0.32 km) or less for three hours from 0800-1000. This 0.32 km visual range is equivalent to a light extinction of $12,225 \text{ Mm}^{-1}$. Hourly transmissometer readings at Badlands were greater than 50 Mm^{-1} for the entire day, with three of these readings at 942 Mm^{-1} , which indicates total obscuration of the 4.15-km transmissometer. Using the transmissometer reading as a substitute for natural background when the hourly reading exceeded 50 Mm^{-1} , the predicted 24-hour visibility impact is reduced to 0.54 percent.

October 26, 2002: Badlands NP

The raw, modeled visibility result for this day was 5.81 percent. This predicted impact occurred on the same day as the October 26, 2002 impact predicted at Wind Cave NP (described above). Using Badlands transmissometer data as a substitute for natural background when the hourly reading exceeded 50 Mm^{-1} , the predicted 24-hour visibility impact is reduced to 0.34 percent.

October 27, 2002: Northern Cheyenne Indian Reservation

The raw, modeled visibility result for this day was 5.92 percent. There were no observations of "present weather" or reduced visibility at Billings, Montana or Sheridan, Wyoming on this day. Therefore, there is no evidence of natural obscuration due to condensed water or means to further refine the result for this day.

March 23, 2002: Northern Cheyenne Indian Reservation

The raw, modeled visibility result for this day was 5.59 percent. Surface meteorological observations at Billings, Montana and Sheridan, Wyoming indicate that a weather event is affecting the area that includes strong natural obscuration. Observed weather at Billings included four hours of snow or mist, and observed weather at Sheridan included seven hours of snow or mist. Visibility was reduced at Billings for the later part of the day, and for most of the morning and the later part of the day at Sheridan. To arrive at a predicted visibility impact that accounts for natural obscuration, CH2M HILL took the measured visual range from the nearest surface station (Sheridan) for hours that included observed weather, and converted the visual range to units of Mm^{-1} . Using the calculated extinction for the obscured hours as a substitute for natural background, the predicted 24-hour visibility impact is reduced to 0.55 percent.

March 9, 2003: Wind Cave NP

The raw, modeled visibility result for this day was 8.31 percent. Transmissometer readings from nearby Badlands NP were missing for all but the final five hours of the day, but surface meteorological observations at Rapid City indicate that strong natural obscuration was in place for most of the day. Observed weather at Rapid City included 11 hours of snow, mist, or haze. Visibility at Rapid City was reduced for each of these 11 hours. To arrive at a predicted visibility impact that accounts for natural obscuration, CH2M HILL took the measured visual range from Rapid City for hours that included observed weather, and converted the visual range to units of Mm^{-1} . Using the calculated extinction for the obscured hours as a substitute for natural background, the predicted 24-hour visibility impact is reduced to 0.69 percent.

December 11, 2003: Wind Cave NP

The raw, modeled visibility result for this day was 8.25 percent. Transmissometer readings at nearby Badlands NP and surface meteorological observations at Rapid City indicate that natural obscuration was in place intermittently during the day. Observed weather at Rapid City included seven hours of light snow. Hourly transmissometer readings at Badlands were greater than 50 Mm^{-1} for the entire day, with four readings of 942 Mm^{-1} (total obscuration). Using the transmissometer reading as a substitute for natural background when the hourly reading exceeded 50 Mm^{-1} , the predicted 24-hour visibility impact is reduced to 0.51 percent.

November 5, 2003: Wind Cave NP

The raw, modeled visibility result for this day was 8.03 percent. Transmissometer readings at nearby Badlands NP and surface meteorological observations in and around Rapid City indicate that natural obscuration was in place. Surface observations at Rapid City include traces of precipitation throughout the day. Measured visibility at Ellsworth AFB is reduced from an instrument maximum reading of 30 miles (48 km) to only 7 miles (11 km) for four hours during the day. The equivalent light extinction value for a visual range of 7 miles is 355 Mm^{-1} . Hourly transmissometer readings at Badlands were greater than 50 Mm^{-1} for the entire day, with a maximum reading of 81 Mm^{-1} . Using the transmissometer reading as a substitute for natural background when the hourly reading exceeded 50 Mm^{-1} , the predicted 24-hour visibility impact is reduced to 2.27 percent.

December 12, 2003: Badlands NP

The raw, modeled visibility result for this day was 5.2 percent. Transmissometer readings from Badlands NP and surface meteorological observations at Rapid City indicate that natural obscuration was in place for most of the day. Observed weather at Rapid City included two hours of mist. Visibility at Rapid City was reduced for several hours, with a minimum reading of 1.2 miles. Hourly transmissometer readings at Badlands were greater than 50 Mm^{-1} for the entire day, with two readings of 942 Mm^{-1} (total obscuration). Using the transmissometer reading as a substitute for natural background when the hourly reading exceeded 50 Mm^{-1} , the predicted 24-hour visibility impact is reduced to 0.38 percent.

November 3, 2003: Northern Cheyenne Indian Reservation

The raw, modeled visibility result for this day was 54.95 percent. Surface meteorological observations at Billings, Montana and Sheridan, Wyoming indicate that a weather event is affecting the area with strong natural obscuration. Observed weather at Billings included 10 hours of snow or mist, and observed weather at Sheridan included 11 hours of mist or freezing rain/rain. Visibility was reduced at Sheridan for the hours that weather was observed, with a minimum reading of 1.5 miles. To arrive at a predicted visibility impact that accounts for natural obscuration, CH2M HILL took the measured visual range from the nearest surface station (Sheridan) for hours that included observed weather, and converted the visual range to units of Mm^{-1} . Using the calculated extinction for the obscured hours as a substitute for natural background, the predicted 24-hour visibility impact is reduced to 2.2 percent.

Additional Days Yielding Raw Impacts > 5%

February 21, 2001: Northern Cheyenne Indian Reservation

The raw, modeled visibility result for this day was 5.05 percent. Surface meteorological observations at Billings, Montana and Sheridan, Wyoming indicate that a weather event is affecting the area that includes natural obscuration. Observed weather at Billings included four hours of fog, ice fog, or mist. Observed weather at Sheridan included four hours with observations of snow or mist. Visibility was reduced at Billings to five miles in the early part of the morning, while visibility at Sheridan was reduced to two miles for a short period in the morning. To arrive at a predicted visibility impact that accounts for natural obscuration, CH2M HILL took the measured visual range from the nearest NWS surface station (Sheridan) for hours that included obscuring weather, and converted the visual range to units of Mm^{-1} . Using the calculated extinction for the obscured hours as a substitute for natural background, the predicted 24-hour visibility impact is reduced to 0.56 percent.

December 5, 2002: Wind Cave NP

The raw, modeled visibility result for this day was 5.17 percent. Transmissometer readings at nearby Badlands NP indicate that pronounced natural obscuration was in place for more than half of the day. Hourly transmissometer readings at Badlands were greater than 50 Mm⁻¹ for 14 hours, with a maximum reading of 942 Mm⁻¹ during the first hour of the day which indicated total obscuration of the 4.15-km transmissometer. Surface maps indicate that a stationary front was located near the southwest corner of South Dakota during the morning hours. Using the transmissometer reading as a substitute for natural background when the hourly reading exceeded 50 Mm⁻¹, the predicted 24-hour visibility impact is reduced to 0.80 percent.

March 7, 2002: Northern Cheyenne Indian Reservation

The raw, modeled visibility result for this day was 5 percent. Surface meteorological observations at Billings, Montana and Sheridan, Wyoming indicate that a pronounced weather event is affecting the area that includes strong natural obscuration. Observed weather at Billings included 22 hours of snow, and observed weather at Sheridan included 11 hours of snow. Visibility was reduced at Billings to less than one mile for several hours during the day, and for one hour at Sheridan. To arrive at a predicted visibility impact that accounts for natural obscuration, CH2M HILL took the measured visual range from the nearest surface station (Sheridan) for hours that included observed weather, and converted the visual range to units of Mm⁻¹. Using the calculated extinction for the obscured hours as a substitute for natural background, the predicted 24-hour visibility impact is reduced to 0.17 percent.

A summary of adjusted CALPUFF visibility results for the years 2001, 2002 and 2003 are shown in Table 5.

Table 5: CALPUFF Visibility Results After Adjustment

Area	Maximum Modeled Light Extinction	Number of Days with Percentage Change > 5%	Number of Days with Percentage Change > 10%
<u>2001</u>			
Wind Cave NP	<5%	0	0
Badlands NP	<5%	0	0
Northern Cheyenne Indian Reservation	6.29%	1	0
<u>2002</u>			
Wind Cave NP	<5%	0	0
Badlands NP	<5%	0	0
Northern Cheyenne Indian Reservation	5.92%	1	0
<u>2003</u>			
Wind Cave NP	<5%	0	0
Badlands NP	<5%	0	0
Northern Cheyenne Indian Reservation	<5%	0	0
Notes:			
NP = National Park			

Table 6 presents a list of CALPUFF/CALPOST files that are associated with the revised Class I modeling for cumulative SO₂ impacts at NCIR and revised visibility modeling for increased condensable particulate emissions. These files and the revised emissions calculations workbook are on the enclosed data CD.

Table 6: Files on Data CD

Filename	Description
B-1_BEPC_Dry_Fork_Emission_Calculations_for_WDEQ_05-31-06.xls	Appendix B Emissions Calculation Workbook
CALPUFF/CALSUM/POSTUTIL/CALPOST Files	
1. Visibility Modeling*	
Files for Wind Cave and Badlands	
DRYFORK.INP (.LST)	CALPUFF input (.INP) and summary file (.LST)
DF_VisPst.INP (.LST)	POSTUTIL input (.INP) and summary file (.LST)
DF_BL-V.INP (.LST)	CALPOST input (.INP) and output (.LST) file for Badlands
DF_WC-V.INP (.LST)	CALPOST input (.INP) and output (.LST) file for Wind Cave
Files for NCIR (2044-receptor grid)	
DRYFORK.INP (.LST)	CALPUFF input (.INP) and summary file (.LST)
DF_VisPst.INP (.LST)	POSTUTIL input (.INP) and summary file (.LST)
DF_NR-V.INP (.LST)	CALPOST input (.INP) and output (.LST) file for NCIR
2. Cumulative SO₂ Increment Modeling at NCIR*	
CALPUFF Files	
NRC_CS3.INP (.LST)	CALPUFF input (.INP) and summary file (.LST) for Colstrip 3-hour PTE
NRC_CS24.INP (.LST)	CALPUFF input (.INP) and summary file (.LST) for Colstrip 24-hour PTE
NRC_WYG.INP (.LST)	CALPUFF input (.INP) and summary file (.LST) for Wygen3 Project
NRC_DF.INP (.LST)	CALPUFF input (.INP) and summary file (.LST) for Dry Fork Project
NRC_MT.INP (.LST)	CALPUFF input (.INP) and summary file (.LST) for (other) Montana sources
NRC_ND.INP (.LST)	CALPUFF input (.INP) and summary file (.LST) for N. Dakota source
NRC_WY.INP (.LST)	CALPUFF input (.INP) and summary file (.LST) for (other) Wyoming sources
CALSUM Files	
CALSUM_3hr.INP (.LST)	CALSUM input and summary file for 3-hour concentrations
CALSUM_24hr.INP (.LST)	CALSUM input and summary file for 24-hour concentrations
CALPOST Files	
PST_NRC3_SO2.INP (.LST)	CALPOST input and output file for 3-hour concentrations in NCIR (all sources)

Filename	Description
PST_NRC24_SO2.INP (.LST)	CALPOST input and output file for 24-hour concentrations in NCIR (all sources)
PST_NRC_SO2DF.INP (.LST)	CALPOST input and output file for concentrations in NCIR (Dry Fork)
* The same list of files applies for each of the years modeled (2001, 2002, and 2003).	

List of Attachments:

- Attachment 1 Revised H₂SO₄ BACT Analysis PC Boiler
- Attachment 2 Revised Section 6.3 Requested Permit Limits PC Boiler
- Attachment 3 Revised CALPUFF Visibility Analysis Data Sheets

Attachment 1

Attachment 1

Dry Fork Station Unit 1 Permit Application

Revised H₂SO₄ BACT Analysis PC Boiler

Based on information provided in the Basin Electric Power Cooperative (BEPC) response to Wyoming Department of Environmental Quality's (WDEQ) Completeness Review dated March 28, 2006 Comment 3, BEPC would like to submit a revised BACT Analysis for H₂SO₄. The requested H₂SO₄ BACT permit limit has been increased from 0.0025 to 0.0045 lb/MMBtu. The revised CALPUFF Class I visibility modeling was performed with the higher H₂SO₄ (and total PM₁₀) values. The modeling results are discussed in the BEPC response memo (under Comment 3) and the files have been enclosed on CD. In the original permit application submitted to WDEQ on November 10, 2005, the H₂SO₄ BACT analysis was coupled with the SO₂ BACT analysis since the same control options apply. The original BACT analysis has been revised, relative to the H₂SO₄ portion, based on recent analysis and discussions with Air Pollution Control equipment vendors.

5.2 BACT Determination

This section presents the required BACT analyses.

5.2.1 Applicability

The requirement to conduct a BACT analysis and determination is set forth in section 165(a)(4) of the Clean Air Act and in federal regulations 40 CFR 52.21(j).

5.2.2 Top-Down BACT Process

EPA has developed a process for conducting BACT analyses. This method is referred to as the "top-down" method. The steps to conducting a "top-down" analysis are listed in EPA's "New Source Review Workshop Manual," Draft, October 1990. The steps are the following:

- Step 1 - Identify All Control Technologies
- Step 2 - Eliminate Technically Infeasible Options
- Step 3 - Rank Remaining Control Technologies by Control Effectiveness
- Step 4 - Evaluate Most Effective Controls and Document Results
- Step 5 - Select BACT

Each of these steps has been conducted for SO₂ and H₂SO₄, and are described below.

5.2.3 SO₂ and H₂SO₄ Analysis

The BACT analysis for sulfur dioxide is presented below. The analysis is also applicable to sulfuric acid mist (H₂SO₄).

Step 1 – Identify All Control Technologies

Sulfur dioxide (SO₂) will be emitted from the proposed Dry Fork Station as a result of the combustion of coal that contains sulfur. The first step is to evaluate SO₂ controls determined to be BACT by permitting agencies across the United States. This information is available from the EPA RACT/BACT/LAER Clearinghouse (RBLC) database accessible on the Internet. The printout from the database for SO₂ is shown in Appendix E, Table E-7 in the original permit application. The printout from the database for H₂SO₄ is shown in Appendix E, Table E-9 in the original permit application. A broad range of other information sources were also reviewed in an effort to identify all potentially applicable emission control technologies.

The potential SO₂ emission reduction options found in the RBLC and other sources that could be applied to the Dry Fork Station are:

- Wet lime/limestone scrubbing
- Dry lime scrubbing

The control efficiencies for these technologies range from 73 percent to 95 percent. However, with the exception of two projects in Wyoming using a circulating dry lime scrubber and one project in Wyoming using a lime spray dryer, the reported removal rates are 90 percent to 95 percent. FGD control efficiencies will be in the lower end of this range when used with low sulfur coal.

Step 2 – Eliminate Technically Infeasible Options

Both of these options are technically feasible for use in reducing SO₂ emissions from the Dry Fork Station. Control efficiencies for circulating dry scrubbers (CDS) have not been demonstrated above 80 percent in the RBLC database. However, this technology has demonstrated SO₂ removal efficiencies above 90 percent in European installations. For this reason this technology was included for further consideration.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

Emission rates for each of the SO₂ removal technologies are ranked in order of their control effectiveness. These effectiveness values are provided in Table 5-1. The PSD NSR regulations require that BACT, at a minimum, meet the applicable NSPS limit, 40 CFR 60 Subpart Da. Because there is an NSPS that applies to the boiler, the NSPS emission limit is also included in the ranking.

TABLE 5-1
SO₂ Control Technology Emission Rate Ranking

Control Technology	SO ₂ Emission Rate ^a
Wet Limestone Scrubbing	0.09 – 0.40
Lime Spray Dryer	0.10 – 0.32
Circulating Dry Scrubber ^c	0.10 – 0.32
Wet Lime Scrubbing	0.13 – 0.25
NSPS Limit	0.34 ^b

^a Pounds per million BTU as found in the RBL database and recently approved PSD permits.

^b Based on an uncontrolled SO₂ emission rate of 1.12 Lb/MmBtu and a removal efficiency of 70 percent, which is the applicable standard under NSPS subpart Da when SO₂ emissions are less than 0.60 pounds per MmBtu.

^c An assumption is made that the current Circulating Dry Scrubber designs are capable of achieving the emission rates shown.

Nomenclature:

NSPS = New Source Performance Standards

Step 4 – Evaluate Most Effective Controls and Document Results

This step involves the consideration of energy, environmental, and economic impacts associated with each control technology. The top-down process requires that the evaluation begin with the most effective technology.

Wet Limestone/Lime FGD

Wet SO₂ scrubbers operate by flowing the flue gas upward through a large reactor vessel that has an alkaline reagent (i.e. limestone or lime slurry) flowing down from the top. The scrubber mixes the flue gas and alkaline reagent using a series of spray nozzles to distribute the reagent across the scrubber vessel. The calcium in the reagent reacts with the SO₂ in the flue gas to form calcium sulfite and/or calcium sulfate that is removed from the scrubber with the sludge and is disposed. Most wet FGD systems utilize forced oxidation to assure that only calcium sulfate sludge is produced. The wet limestone forced oxidation (LSFO) process is used in most new wet FGD installations. Several variations on the wet FGD technology are offered by various process developers. These variations include using a jet bubbling reactor as a combination SO₂ absorber and calcium sulfite oxidation vessel, and using magnesium enhanced lime as the alkaline reagent.

The creation of a wet sludge from the scrubber does create a solid waste handling and disposal problem. This sludge needs to be handled in a manner to not result in ground water contamination. Also, the sludge disposal area needs to be permanently set aside from future surface uses since the disposed sludge can not bear any weight from such uses as buildings or cultivated agriculture. Wet FGD systems can produce salable gypsum if a gypsum market is available, reducing the quantity of solid waste that needs to be disposed of from the power plant.

Other disadvantages associated with wet limestone or lime FGD includes the creation of a wet stack plume, generation of primary particulate matter by the scrubbing process, increased acid gas emissions, incompatibility with mercury removal options and water/wastewater issues. Wet FGD generates more primary particulate emissions leaving the stack than dry FGD systems because the particulate removal device (ESP or Fabric Filter) is upstream of the scrubber instead of downstream as in this case. Sulfuric acid removal for a wet FGD system is in the range of 40 to 60 percent compared to 80 to 90 percent for a dry lime absorber/fabric filter combination. The potential future use of activated carbon or sorbent injection for mercury removal is also limited with a wet FGD application since the fabric filter is upstream of the scrubber and the flue gas temperature is higher than the optimum mercury capture range.

Wet FGD also requires more makeup water than Dry FGD, and typically requires a wastewater blowdown stream that must be treated to limit the buildup of chlorides in the absorber scrubbing loop. Given that the amount of water available for the Dry Fork Station is quite limited to the point of requiring dry cooling for much of its heat dissipation, the increased water consumption required for the wet scrubber is a serious concern.

Dry Lime FGD Absorber Followed by Fabric Filter

In CDS and lime spray dryer systems, SO₂ reacts with lime in an absorber vessel. The CDS absorber operates as a circulating fluidized bed of hydrated lime, reaction products and ash. The flue gas is humidified at the venturi inlet in the bottom of the fluidized bed. Dry hydrated lime and recycle solids are injected above the venturi. The hydrated lime reacts with the SO₂ in the flue gas reacts to form particulate calcium sulfate. This dry material is captured in the fabric filter along with the fly ash.

The lime spray dryer typically injects lime slurry in the top of the vessel with a rapidly rotating atomizer wheel. The rapid speed of the atomizer wheel causes the lime slurry to separate into very fine droplets that intermix with the flue gas where the SO₂ in the flue gas reacts with the calcium in the lime slurry to form particulate calcium sulfate. This dry material is captured in the fabric filter along with the fly ash.

The CDS and lime spray dryer FGD systems produce a dry waste product suitable for landfill disposal.

CDS and lime spray dryer systems are in operation at many facilities in Europe, China and the U.S. ranging in size from less than 10 MW to 350 MW. CDS and lime spray dryer FGD are commercially available from multiple process developers/vendors.

The dry FGD systems have a number of advantages when compared to wet FGD technology. The absorber vessel can be constructed of unlined carbon steel, as opposed to lined carbon steel or solid alloy construction for wet FGD, and the capital cost is typically lower than for wet FGD.

The pressure drop across the absorber is typically lower than wet FGD systems. Pumping requirements and overall power consumption are lower than for wet FGD systems. The dry FGD systems use less equipment than does the wet FGD system, resulting in fixed, lower operations and maintenance (O&M) labor requirements.

Sulfur trioxide (SO₃) in the vapor above approximately 300°F, which condenses to liquid sulfuric acid at a lower temperature (below acid dew point), is removed efficiently with a CDS or lime spray dryer system. Wet scrubbers capture less than 40 to 60 percent of SO₃ and may require the addition of a wet ESP, or hydrated lime injection, to remove the balance of SO₃. Otherwise, the emission of sulfuric acid mist, if above a threshold value, may result in a visible plume after the vapor plume dissipates.

Flue gas following a dry FGD system is not saturated with water (30°F to 50°F above dew point), which reduces or eliminates a visible moisture plume. Wet FGD scrubbers produce flue gas that is saturated with water, which would require a gas-gas heat exchanger to reheat the flue gas if it were to operate as a dry stack. Due to the high capital and operating costs associated with heating the flue gas, all recent wet FGD systems in the United States have used wet stack operation.

Waste produced is in a dry form and can be handled with conventional pneumatic fly ash handling equipment. The waste is stable for landfill purposes and can be disposed of concurrently with fly ash.

There is no liquid waste from a dry FGD system, while wet FGD systems may produce a liquid waste stream, especially if the gypsum is to be sold for wallboard. In some cases, a wastewater treatment plant must be installed to treat the liquid waste prior to disposal. The wastewater treatment plant produces a small volume of solid waste, which may be contaminated with toxic metals (including mercury) that must be disposed of in a landfill. The humidification stream of a CDS system provides a way to achieve a dry by-product from process wastewater from other parts of the plant when processing residue for disposal.

Dry FGD technology has only a few disadvantages when compared to wet FGD technology. The dry FGD process uses a more expensive reagent (hydrated lime) than limestone-based FGD systems, and the reagent has to be stored in a steel or concrete silo. Reagent utilization is lower than for wet limestone systems to achieve comparable SO₂ removal. The lime stoichiometric ratio is higher than the limestone stoichiometric ratio (on the same basis) to achieve comparable SO₂ removal.

The CDS process is applicable mostly for base-load applications such as at the Dry Fork Station, as high velocities are required to maintain the bed in suspension. The standard design includes provisions for ID fan recycle to keep the gas velocity high in the CDS vessel to mitigate this shortcoming.

Since dry FGD is being proposed for this project, the environmental, energy and economic impacts must be examined. Sargent & Lundy, the Engineer for the Dry Fork project, developed cost estimates for a dry lime FGD and for a wet limestone FGD installation and operation. The average cost effectiveness of a dry lime FGD system designed to achieve a controlled SO₂ emission rate of 0.10 lb/mmBtu (87.8 percent SO₂ removal efficiency based on 0.33 wt. percent average coal sulfur content) was estimated at \$1,248 per ton of SO₂ controlled. The average cost effectiveness of the wet scrubbing system designed to achieve a controlled SO₂ emission rate of 0.09 lb/mmBtu (89.0 percent SO₂ removal efficiency based on 0.33 wt. percent average coal sulfur content) was estimated to be \$1,450 per ton of SO₂ controlled.

Based on average cost effectiveness calculations, both wet and dry FGD systems appear to be cost effective. An incremental cost analysis was also prepared to evaluate the incremental cost effectiveness of the wet scrubbing system. The incremental cost effectiveness of the wet limestone FGD (compared to the dry lime FGD) was calculated at \$13,157 per additional ton of SO₂. The incremental cost effectiveness reflects the additional capital, O&M, and fabric filter costs associated with the wet FGD system.

With a wet FGD design, the fabric filter would be prior to the FGD system, and the resultant capital and operating costs are higher than a similar fabric filter that follows a dry lime FGD system. A comparison of the costs and SO₂ removed is summarized in Table 5-2. The annualized cost estimate for a wet lime system would be similar to the one prepared for wet limestone with the primary difference being the higher cost of lime reagent. Because wet limestone FGD has a similar removal efficiency to wet lime FGD and the operating costs are lower, it was decided that wet limestone FGD was the appropriate cost comparison alternative to the dry lime FGD system.

Dry FGD has the advantages of producing a dry waste material and requiring less makeup water in the absorber over a wet scrubber. Given that the amount of water available for Dry Fork is quite limited to the point of requiring dry cooling for much of its heat dissipation, the reduced water consumption required for dry FGD is major advantage for this technology.

A Dry FGD system has the additional advantage of requiring less electric power for its operation compared to a Wet FGD system. A dry FGD system at Dry Fork would require approximately 2.8 MW of power compared to approximately 5.3 MW for Wet FGD. This would equate to an annual power savings of approximately 18.6 million kW-Hr for dry FGD versus wet FGD for Dry Fork based on an 85 percent annual plant capacity factor. Instead of this amount of power being used in the power plant, this power can instead be sold to Basin Electric's customers reducing the need to produce this power elsewhere.

TABLE 5-2
Dry Form SO₂ Control Cost Comparison

Factor	Dry Lime FGD	Wet Limestone FGD
Total Installed Capital Costs	\$ 63.6 Million	\$ 77.4 Million
Total Fixed & Variable O&M Costs	\$ 4.4 Million	\$ 4.8 Million
Total Annualized Cost	\$ 15.0 Million	\$ 17.6 Million
FGD Design Control Efficiency	87.8 percent	89.0 percent
Tons SO ₂ Removed per Year	11,980	12,144
Cost Effectiveness per Ton of SO ₂ Removed	\$ 1,248	\$ 1,450
Incremental Annualized Cost Difference between Wet LSFO FGD and dry lime FGD	-	\$ 2.6 Million
Incremental Tons SO ₂ Removed between Wet LSFO FGD and dry lime FGD	-	202
Incremental Cost Effectiveness per Ton of Additional SO ₂ Removed by Wet LSFO FGD	-	\$ 13,157

Basin Electric believes that the high additional cost of wet limestone/lime scrubbing is not warranted for this project based on the use of low sulfur coal and the limited additional tons of SO₂ removed. Wet FGD also has the disadvantages of waste disposal of a wet FGD sludge, increased water consumption requirements, possible future complications with mercury removal, higher particulate emissions and the fact that dry FGD can meet a SO₂ emission limit that is comparable to BACT as determined in other recent permits listed in the RBLC database.

Step 5 – Select BACT

SO₂

The final step in the top-down BACT analysis process is to select BACT. EPA's RACT/BACT/LAER Clearinghouse (RBLC), a database of past technology decisions, and recently approved PSD permits were again consulted to assist in selecting BACT for this project.

Both dry FGD and wet limestone scrubbing have been demonstrated at removal efficiencies greater than 90 percent. The installation of a dry FGD system on Dry Fork will result in a SO₂ removal efficiency of 91.7 percent for the design maximum coal sulfur content of 0.47 weight percent. The highest collection efficiency shown in the RBLC is 95 percent on Santee Cooper Cross Unit No. 1, however, this unit burns high sulfur coal and is equipped with a wet limestone FGD system.

The recent additions of the 750-net MW MidAmerican Council Bluffs Energy Center (CBEC) Unit 4 and the 750-net MW Xcel Energy Comanche Unit 3, which are under construction, were both permitted at 0.10 lb/mmBtu (30-day rolling average) based on the use of low

sulfur PRB coal and a lime spray dryer FGD. The design SO₂ emission rate for Dry Fork is 0.10 lb/mmBtu which is identical to the CBEC Unit 4 and Comanche Unit 3 design SO₂ emission rate, and consistent with the low end of the range of emissions for units in the RBLC.

The 950-gross MW Intermountain Power Project (IPP) Unit 3 was recently permitted at 0.09 lb/mmBtu (30-day rolling average) based on the use of western bituminous coal and a wet limestone FGD. This is equivalent to 92.5 percent SO₂ removal in the wet FGD system when firing the worst case design fuel. Using low sulfur coal and dry FGD, Dry Fork will achieve a controlled emission rate almost equivalent to IPP. As shown above, wet FGD is not incrementally cost effective on this project. Therefore, dry FGD is selected as the technology to achieve the BACT SO₂ emission limit for this project of 0.10 lb/mmBtu based on a 3-hour block average.

On March 9, 2006, BEPC provided additional SO₂ BACT analysis information to WDEQ as part of the response to the December 21, 2005 completeness letter. In Attachment 1 to that response, BEPC analyzed the technical feasibility and costs associated with dry lime and wet limestone scrubbers to achieve controlled emission rates of 0.07, 0.08 and 0.09 lb/mmBtu. The conclusions supported the original analysis of dry lime scrubbing with a controlled emission rate of 0.10 lb/mmBtu (or 380.1 lb/hr at the maximum design heat input of 3,801 mmBtu/hr).

H₂SO₄

The EPA NSR RBLC database shows the comparable sources related to sulfuric acid mist (H₂SO₄). They are shown in Table E-9 in Appendix E of the original application. Many of the sources determined that the use of a dry lime scrubber followed by a fabric filter was technology chosen to achieve BACT. Most of the other sources selected wet FGD system to achieve BACT emissions levels for sulfuric acid. Sargent & Lundy estimates a 80 to 90 percent sulfuric acid control level with the proposed Dry Fork Unit 1 design.

As discussed in the BEPC response memo to the WDEQ March 28, 2006 completeness letter (Comment 3), air pollution control equipment vendors have not been willing to guarantee H₂SO₄ emission rates below approximately 2 ppmvd @ 3% O₂ (approximately 0.005 lb/mmBtu depending on boiler design and performance) due to the detection limit and interference issues associated with EPA Test Method 8 used to demonstrate compliance. Therefore, to ensure that a guarantee can be obtained for the proposed emission rate, BEPC is proposing a controlled H₂SO₄ emission rate of 17.1 lb/hr (0.0045 lb/mmBtu or approximately 2 ppmvd @ 3% O₂).

Other recent permit limits for H₂SO₄ include Roundup Units 1 and 2 at 0.0064 lb/mmBtu, CBEC Unit 4 at 0.0042 lb/mmBtu, IPP Unit 3 at 0.0044 lb/mmBtu, Weston Unit 4 at 0.0050 lb/mmBtu and Comanche Unit 3 at 0.0042 lb/mmBtu.

Based on the technology and clearinghouse database discussion above, a dry lime FGD system followed by a fabric filter are selected as BACT for the project with a sulfuric acid emission rate of 0.0045 lb/mmBtu (or 17.1 lb/hr at the maximum design heat input of 3,801 mmBtu/hr).

A Hachment 2

Attachment 2

Dry Fork Station Unit 1 Permit Application

Revised Section 6.3 Requested Permit Limits PC Boiler

Based on information provided in the Basin Electric Power Cooperative (BEPC) response to Wyoming Department of Environmental Quality's (WDEQ) Completeness Review dated March 28, 2006 Comment 3, BEPC would like to request revised Unit 1 PC boiler permit limits as shown below. The total PM₁₀ emission estimate (filterable and condensible) has been increased from 0.017 to 0.020 lb/mmBtu. However, because of the uncertainties associated with establishing a condensible PM₁₀ emission rate, and the issues associated with the test method used to demonstrate compliance with a condensible PM₁₀ emission limit, we request that the limit be placed in the permit for emission inventory purposes only and not as an enforceable emission limit. The requested H₂SO₄ BACT permit limit has been increased from 9.5 to 17.1 lb/hr (0.0025 to 0.0045 lb/mmBtu) to account for anticipated emission guarantees and test method limitations. The revised CALPUFF Class I visibility modeling was performed with the higher total PM₁₀ and H₂SO₄ values. The modeling results are discussed in the BEPC response memo (under Comment 3) and the files have been enclosed on CD. BEPC is also requesting that the short-term 3-hr SO₂ limit, and the BACT limits for H₂SO₄ and HF be on a lb/hr basis versus a lb/mmBtu basis.

SO₂: 380.1 lb/hr based on a 3-hr block average, except during periods of startup, shutdown, maintenance/planned outage, or malfunction. Compliance with the emission limit will be demonstrated using a SO₂ CEMS compliant with the requirements of 40 CFR Part 75.

SO₂: 0.10 lb/mmBtu heat input based on a 30 day rolling average as determined by the arithmetic average of all hourly emission rates for the 30 successive boiler operating days, except during periods of startup, shutdown, maintenance/planned outage, or malfunction. Compliance with the emission limit will be demonstrated using a SO₂ CEMS compliant with the requirements of 40 CFR Part 75.

SO₂: 1,625 tpy annual 12-month rolling including periods of startup, shutdown and malfunction. Compliance with the emission limit will be demonstrated using a SO₂ CEMS compliant with the requirements of 40 CFR Part 75.

NO_x: 0.07 lb/mmBtu heat input based on a 30 day rolling average as determined by the arithmetic average of all hourly emission rates for the 30 successive boiler operating days, except during periods of startup, shutdown, maintenance/planned outage, or malfunction. Compliance with the emission limit will be demonstrated using a NO_x CEMS compliant with the requirements of 40 CFR Part 75.

NO_x: 1,137 tpy annual 12-month rolling including periods of startup, shutdown and malfunction. Compliance with the emission limit will be demonstrated using a NO_x CEMS compliant with the requirements of 40 CFR Part 75.

PM₁₀ (filterable): 0.012 lb/mmBtu heat input except during periods of startup, shutdown, maintenance/planned outage, or malfunction based on the average of three (3) one-hour

stack tests conducted annually using USEPA Test Methods 5, 17, 201, or 201A as described in Section 9.0 of the permit application.

Opacity: 20% based on six minute averages except for one 6-minute period per hour that may not exceed 27%.

CO: 0.15 lb/mmBtu heat input based on a 30 day rolling average as determined by the arithmetic average of all hourly emission rates for the 30 successive boiler operating days, except during periods of startup, shutdown, maintenance/planned outage, or malfunction. Compliance with the emission limit will be demonstrated using a CO CEMS compliant with the requirements of 40 CFR Part 60.

CO: 2,437 tpy annual 12-month rolling including periods of startup, shutdown and malfunction. Compliance with the emission limit will be demonstrated using a CO CEMS compliant with the requirements of 40 CFR Part 60.

VOC: 61 tpy on an annualized average based on an emission rate of 0.00385 lb/mmBtu heat input, except during periods of startup, shutdown, maintenance/planned outage, or malfunction. Compliance with the VOC emission rate will be demonstrated based on the average of three (3) one-hour stack tests using USEPA Test Method 25 or 25A as described in Section 9.0 of the permit application.

H₂SO₄: 17.1 lb/hr. Compliance with the H₂SO₄ emission rate will be demonstrated based on the average of three (3) on-hour stack tests using USEPA Test Method 8 or WDEQ approved alternate method as described in Section 9.0 of the permit application.

HF: 2.62 lb/hr. Compliance with the HF emission rate will be demonstrated based on the average of three (3) on-hour stack tests using USEPA Test Method 26A or WDEQ approved alternate method as described in Section 9.0 of the permit application.

Mercury: 78×10^{-6} lb/MW-hr on an output basis 12 month rolling average. Compliance will be demonstrated with a mercury CEMS per 40 CFR Part 75 requirements.

Attachment 3

DEQ/AQD 000658

Attachment 4

Attachment 3
 Revised CALPUFF Model Data Sheets
 Wind Cave 2001

JD 81 (82,0): Mar 22

YEAR	DAY	TIME	REC#	TOT EXT	MODEL EXT	FLAG BGRND	% CHANGE	RH-FAC	BGRND (FLAG/BAD)	%CHNG (FLAG/BAD)*	Rapid City Weather	Rapid City Visibility (miles)
2001	81	100	285	15.783	0.107	15.676	0.68	1.96	15.676		rain, thunderstorm	10
2001	81	200	285	16.421	0.145	16.276	0.89	2.959	16.276			10
2001	81	300	285	17.354	0.238	17.116	1.39	4.359	17.116			10
2001	81	400	285	16.738	0.22	16.518	1.33	3.364	16.518			10
2001	81	500	285	16.81	0.292	16.518	1.77	3.364	53			10
2001	81	600	285	16.936	0.418	16.518	2.53	3.364	157			9.9
2001	81	700	285	17.814	0.698	17.116	4.08	4.359	942		mist, fog	0.2
2001	81	800	285	22.386	2.018	20.368	9.91	9.779	942		fog	0.2
2001	81	900	285	22.729	2.361	20.368	11.59	9.779	942		fog	0.2
2001	81	1000	285	22.942	2.574	20.368	12.64	9.779	942		fog	0.2
2001	81	1100	285	23.259	2.891	20.368	14.19	9.779	942		mist, fog	0.2
2001	81	1200	285	23.629	3.261	20.368	16.01	9.779	437		mist, fog	0.5
2001	81	1300	285	23.764	3.396	20.368	16.67	9.779	561		mist	1.7
2001	81	1400	285	23.61	3.242	20.368	15.92	9.779	414		mist	1.7
2001	81	1500	285	19.859	1.794	18.065	9.93	5.941	789		mist	6
2001	81	1600	285	22.916	2.548	20.368	12.51	9.779	818		mist	6
2001	81	1700	285	22.61	2.242	20.368	11.01	9.779	942		mist	3
2001	81	1800	285	22.353	1.985	20.368	9.75	9.779	942		mist	3
2001	81	1900	285	22.128	1.76	20.368	8.64	9.779	942		mist	0.8
2001	81	2000	285	21.602	1.234	20.368	6.06	9.779	942		mist	0.8
2001	81	2100	285	22.076	1.708	20.368	8.39	9.779	942		fog	0.2
2001	81	2200	285	22.031	1.663	20.368	8.16	9.779	942		fog	0.2
2001	81	2300	285	21.611	1.243	20.368	6.10	9.779	942		fog	0.2
2001	82	0	285	21.822	1.454	20.368	7.14	9.779	942		fog	0.2
				20.80	1.65	19.15	8.59	7.756	647.52	0.25		

DEQ/AQD 000660

* % change based on background from IMPROVE transmissometer at Badlands NP (if >50 1/Mm)

YEAR	DAY	HR	RECEP	COORDIN. (km)	TYPE	BEXT(Mod)	BEXT(BKG)	BEXT(Total)	%CHANGE	F(RH)	bxSO4	bxNO3	bxOC	bxEC	bxPMC	bxPMF		
2001	82		0	285	117.585	-37.827	D	1.65	19.15	20.80	8.59	7.756	1.079	0.562	0.004	0	0	0.001

JD 82 (83.0): Mar 23

YEAR	DAY	TIME	REC#	TOT EXT	MODEL EXT	FLAG BGRND	% CHANGE	RH-FAC	BGRND (FLAG/BAD)	%CHNG (FLAG/BAD)*	Rapid City Weather	Rapid City Visibility (miles)
2001	82	100	104	21.81	1.442	20.368	7.08	9.779	942		fog	0.2
2001	82	200	104	21.991	1.623	20.368	7.97	9.779	921		mist	0.8
2001	82	300	104	22.184	1.816	20.368	8.92	9.779	942		fog	0.2
2001	82	400	104	22.356	1.988	20.368	9.76	9.779	942		fog	0.2
2001	82	500	104	22.495	2.127	20.368	10.44	9.779	942		fog, mist	0.2
2001	82	600	104	22.577	2.209	20.368	10.85	9.779	942		snow	5
2001	82	700	104	22.588	2.22	20.368	10.90	9.779	368		drizzle, mist	5
2001	82	800	104	22.618	2.25	20.368	11.05	9.779	214		mist	7
2001	82	900	104	22.479	2.111	20.368	10.36	9.779	216		mist, snow	2.5
2001	82	1000	104	22.27	1.902	20.368	9.34	9.779	124		mist	6
2001	82	1100	104	19.068	1.003	18.065	5.55	5.941	121		mist	6
2001	82	1200	104	18.901	0.836	18.065	4.63	5.941	99		mist	3.7
2001	82	1300	104	21.465	1.097	20.368	5.39	9.779	72			10+
2001	82	1400	104	21.208	0.84	20.368	4.12	9.779	72			10+
2001	82	1500	104	16.737	0.219	16.518	1.33	3.364	68			10+
2001	82	1600	104	16.686	0.168	16.518	1.02	3.364	108			10+
2001	82	1700	104	16.647	0.129	16.518	0.78	3.364	118			10+
2001	82	1800	104	16.615	0.097	16.518	0.59	3.364	68			9.9
2001	82	1900	104	16.591	0.073	16.518	0.44	3.364	68			10+
2001	82	2000	104	16.584	0.066	16.518	0.40	3.364	74			10+
2001	82	2100	104	16.604	0.086	16.518	0.52	3.364	70			10+
2001	82	2200	104	16.607	0.089	16.518	0.54	3.364	80			10+
2001	82	2300	104	18.225	0.16	18.065	0.89	5.941	82			10+
2001	83	0	104	18.224	0.159	18.065	0.88	5.941	77			9.9
				19.73	1.03	18.701	5.51	7.001	322.08	0.32		

DEQ/AQD 000661

* % change based on background from IMPROVE transmissometer at Badlands NP (if >50 1/Mm)

Model Extinction by		Species		TYPE	BEXT(Mod)	BEXT(BKG)	BEXT(Total)	%CHANGE	F(RH)	bxSO4	bxNO3	bxOC	bxEC	bxPMC	bxPMF		
YEAR	DAY	RECEP	COORDIN. (km)														
2001	83	0	104	115.858	-49.5	D	1.03	18.701	19.73	5.51	7.001	0.728	0.299	0.002	0	0	0

Attachment
 Revised CALPUFF Data Sheets
 Northern California 2001

JD 54 (55,0): Feb 23

YEAR	DAY	TIME	REC#	TOT EXT	MODEL EXT	FLAG BGRND	% CHANGE	RH-FAC	Billings Weather	Billings VR	Sheridan Weather	Sheridan VR	Sheridan (km)	FLAG or Method7 BGRND*	% CHANGE (Method 7)
2001	54	100	1960	18.23	0.165	18.065	0.91	5.941		10+		7		18.065	
2001	54	200	1960	18.085	0.02	18.065	0.11	5.941		10+	mist	1.2	1.9	2026	
2001	54	300	1960	20.375	0.007	20.368	0.03	9.779		10+	fog, depositing rime, sky not	0.2	0.3	12154	
2001	54	400	1960	16.52	0.002	16.518	0.01	3.364		10+	fog, depositing rime, sky not	0.5	0.8	4862	
2001	54	500	1960	20.379	0.011	20.368	0.05	9.779		9	fog, depositing rime, sky not	0.2	0.3	12154	
2001	54	600	1960	18.139	0.074	18.065	0.41	5.941	Mist	5	fog, depositing rime, sky not	0.2	0.3	12154	
2001	54	700	1960	19.074	1.009	18.065	5.59	5.941	Mist	5		4	6.4	608	
2001	54	800	1960	19.417	1.352	18.065	7.48	5.941	Mist	6		5	8.0	486	
2001	54	900	1960	16.751	0.233	16.518	1.41	3.364	Mist	5		5	8.0	486	
2001	54	1000	1960	26.316	5.948	20.368	29.20	9.779	Mist	4		4	6.4	608	
2001	54	1100	1960	22.225	4.18	18.065	23.03	5.941	Mist	5		4	6.4	608	
2001	54	1200	1960	20.078	3.15	16.928	18.81	4.047		8.7		3.7	6.0	657	
2001	54	1300	1960	23.839	5.574	18.065	30.86	5.941		10+		5	8.0	486	
2001	54	1400	1960	22.106	4.99	17.116	29.15	4.359		9		6	9.7	405	
2001	54	1500	1960	30.255	9.887	20.368	48.54	9.779	Mist	5		3	4.8	810	
2001	54	1600	1960	21.387	4.271	17.116	24.95	4.359	Mist	5		5	8.0	486	
2001	54	1700	1960	21.725	4.609	17.116	26.93	4.359	Mist	5		8		17.116	
2001	54	1800	1960	19.78	3.262	16.518	19.75	3.364	Mist	5		8.7		16.518	
2001	54	1900	1960	19.736	2.62	17.116	15.31	4.359	Mist	6		9		17.116	
2001	54	2000	1960	18.418	1.302	17.116	7.61	4.359		8		9		17.116	
2001	54	2100	1960	18.904	0.839	18.065	4.64	5.941		10+		7		18.065	
2001	54	2200	1960	18.38	0.315	18.065	1.74	5.941		10+		9		18.065	
2001	54	2300	1960	18.151	0.086	18.065	0.48	5.941		8		9		18.065	
2001	55	0	1960	18.078	0.013	18.065	0.07	5.941		6.8	mist	5.6	9.0	434	
				2.246	18.01	12.47	5.85							2065.209	0.11

* When fog/precip, etc. is observed, BGRND (1/Mm) = 3912/VR(km). CALPOST Method 7.

DEQ/AQD 000662

YEAR	DAY	HR	Model Extinction	Species	RECF	COORDIN (km)	TYPE	BEXT(Mod)	BEXT(BKG)	BEXT(Total)	%CHANGE F(RH)	bxSO4	bxNO3	bxOC	bxEC	bxPMC	bxPMF	
2001	55	0	1960	-102.137	159.738	D	2.246	18.01	20.256	12.47		5.85	1.36	0.863	0.017	0	0	0.006

Attachment
Revised CALPUFF Data Sheets
Northern Cheyenne 2001

JD 96 (97,0): Apr 6

DEQ/AQD 000663

YEAR	DAY	TIME	REC#	TOT EXT	MODEL EXT	FLAG BGRND	% CHANGE	RH-FAC	Billings Weather	Billings VR	Sheridan Weather	Sheridan VR	Sheridan (km)	FLAG or Method7 BGRND*	% CHANGE (Method 7)
2001	96	100	913	17.866	0.75	17.116	4.38	4.359		10+		10+		17.116	4.4%
2001	96	200	913	19.865	2.749	17.116	16.06	4.359		10+		10+		17.116	16.1%
2001	96	300	913	35.463	15.095	20.368	74.11	9.779		10+		10+		20.368	74.1%
2001	96	400	913	33.246	12.878	20.368	63.23	9.779		10+		10+		20.368	63.2%
2001	96	500	913	22.361	4.296	18.065	23.78	5.941		10+		10+		18.065	23.8%
2001	96	600	913	20.071	2.006	18.065	11.10	5.941		9.9		9.9		18.065	11.1%
2001	96	700	913	16.808	0.29	16.518	1.76	3.364		10+		10+		16.518	1.8%
2001	96	800	913	18.678	0	18.678	-	6.963		10+		10+		18.678	0.0%
2001	96	900	913	16.14	0	16.14	-	2.733		10+		10+		16.140	0.0%
2001	96	1000	913	15.534	0.015	15.519	0.10	1.699		10+		10+		15.519	0.1%
2001	96	1100	913	15.443	0.065	15.378	0.42	1.463		10+		10+		15.378	0.4%
2001	96	1200	913	15.467	0.129	15.338	0.84	1.397		9.9		9.9		15.338	0.8%
2001	96	1300	913	15.359	0.149	15.21	0.98	1.183		10+		10+		15.210	1.0%
2001	96	1400	913	15.398	0.188	15.21	1.24	1.183		10+		10+		15.210	1.2%
2001	96	1500	913	15.49	0.209	15.281	1.37	1.302		10+	slight, continuous rain	10	16.1	243	0.1%
2001	96	1600	913	15.718	0.199	15.519	1.28	1.699		10+		10+		15.519	1.3%
2001	96	1700	913	15.474	0.096	15.378	0.62	1.463		10+	Thunderstorm, no precipitation	10+		15.378	0.6%
2001	96	1800	913	15.653	0.04	15.613	0.26	1.855		9.9	Thunderstorm, no precipitation	9.9		15.613	0.3%
2001	96	1900	913	15.345	0.007	15.338	0.05	1.397		10+		10+		15.338	0.0%
2001	96	2000	913	15.77	0.001	15.769	0.01	2.115	Thunderstorms with no precipitation	10+		10+		15.769	0.0%
2001	96	2100	913	15.769	0	15.769	-	2.115	Thunderstorms, slight rain showers	10+		10+		15.769	0.0%
2001	96	2200	913	15.769	0	15.769	-	2.115	Thunderstorms, Slight, Continuous rain	10+		10+		15.769	0.0%
2001	96	2300	913	15.858	0	15.858	-	2.263	Slight, Continuous rain	10+		10+		15.858	0.0%
2001	97	0	913	15.579	0	15.579	-	1.798		9.9		9.9		15.579	0.0%
				18.09	1.632	16.457	9.92	3.261						25.949	6.29

* When fog/preclp, etc. is observed, BGRND (1/Mm) = 3912/VR(km). CALPOST Method 7.

YEAR	DAY	HR	Model Extinctio	Species	RECEP COORDIN/ (km)	TYPE	BEXT (Mod BEXT (BKG BEXT (Total)	%CHANGE F(RH)	bxSO4	bxNO3	bxOC	bxEC	bxPMC	bxPMF
2001	97	0			913 -124.947	166.811 D	1.632 16.457	18.09 9.92	3.261	0.838	0.782	0.008	0	0 0.004

Attachment
Revised CALPUFF Data Sheets
Northern Cheyenne 2001

JD 52 (53.0): Feb 21

YEAR	DAY	TIME	REC#	TOT EXT	MODEL EXT	FLAG BGRND	% CHANGE	RH-FAC	Billings Weather	Billings VR	Sheridan Weather	Sheridan VR	Sheridan (km)	FLAG or Method7 BGRND*	% CHANGE (Method 7)
2001	52	100	924	17.751	0.823	16.928	4.86	4.047			slight, continuous fall of snowflakes, mist	2.5	4.0	972	
2001	52	200	924	25.911	5.543	20.368	27.21	9.779			slight, continuous fall of snowflakes, mist	2	3.2	1215	
2001	52	300	924	24.502	4.134	20.368	20.30	9.779			slight, continuous fall of snowflakes, mist	4	6.4	608	
2001	52	400	924	24.181	3.793	20.368	18.62	9.779			9	10+		20.368	
2001	52	500	924	20.503	2.438	18.065	13.50	5.941	mist		6	10+		18.065	
2001	52	600	924	18.059	1.131	16.928	6.68	4.047	mist		5	8.7		16.928	
2001	52	700	924	19.027	0.962	18.065	5.33	5.941	mist		5	9		18.065	
2001	52	800	924	18.793	0.728	18.065	4.03	5.941	fog or ice fog		9	8		18.065	
2001	52	900	924	16.75	0.315	16.435	1.92	3.224			10+ mist	5	8.0	486	
2001	52	1000	924	16.657	0.222	16.435	1.35	3.224			10+	9		16.435	
2001	52	1100	924	16.321	0.113	16.208	0.70	2.846			10+	7		16.208	
2001	52	1200	924	16.244	0.036	16.208	0.22	2.846			9.9	7.5		16.208	
2001	52	1300	924	15.987	0.005	15.982	0.03	2.469			10+	9		15.982	
2001	52	1400	924	15.613	0	15.613	-	1.855			10+	10+		15.613	
2001	52	1500	924	15.647	0	15.647	-	1.911			10+	10+		15.647	
2001	52	1600	924	15.401	0	15.401	-	1.501			10+	10+		15.401	
2001	52	1700	924	15.401	0	15.401	-	1.501			10+	10+		15.401	
2001	52	1800	924	15.401	0	15.401	-	1.501			9.9	9.9		15.401	
2001	52	1900	924	15.46	0	15.46	-	1.599			10+	10+		15.46	
2001	52	2000	924	15.46	0	15.46	-	1.599			10+	10+		15.46	
2001	52	2100	924	15.46	0	15.46	-	1.599			10+	10+		15.46	
2001	52	2200	924	15.46	0	15.46	-	1.599			10+	10+		15.46	
2001	52	2300	924	15.338	0	15.338	-	1.397			10+	10+		15.338	
2001	53	0	924	16.208	0	16.208	-	2.846			9.9	9.9		16.208	
					0.84	16.720	5.04	3.70						150.37	0.56

DEQA/QD 000664

YEAR	DAY	HR	Model Extinction by Species	RECEI COORDIN/ (km)	TYPE	BEXT(Mod BEXT(BKG BEXT(Total)	%CHANGE(F(RH)	bxSO4	bxNO3	bxOC	bxEC	bxPMC	bxPMF			
2001	53	0		924 -114.354	166.812 D	0.84	16.72	17.583	5.05	3.699	0.385	0.45	0.005	0	0	0.004

Attachment
 Revised CALPUFF Data Sheets
 Wind Cave and Badlands 2002

JD 299 (300,0): Oct 26 [Wind Cave]

DEQ/AQD 000665

YEAR	DAY	TIME	REC#	TOTEXT	MODEL EXT	FLAG BGRND	% CHANGE	RH-FAC	BGRND (FLAG/BAD)	%CHNG (FLAG/BAD)*	Rapid City Weather	Rapid City Visibility (miles)
2002	299	100	103	15.467	0.234	15.233	1.54	1.222	190		missing	missing
2002	299	200	103	22.493	2.125	20.368	10.43	9.779	228		missing	missing
2002	299	300	103	22.762	2.394	20.368	11.75	9.779	181		missing	missing
2002	299	400	103	22.94	2.572	20.368	12.63	9.779	189		missing	missing
2002	299	500	103	23.057	2.689	20.368	13.20	9.779	495		missing	missing
2002	299	600	103	23.12	2.752	20.368	13.51	9.779	498		missing	missing
2002	299	700	103	23.116	2.748	20.368	13.49	9.779	942		missing	missing
2002	299	800	103	23.385	3.017	20.368	14.81	9.779	495		missing	missing
2002	299	900	103	23.459	3.091	20.368	15.18	9.779	376		missing	missing
2002	299	1000	103	23.345	2.977	20.368	14.62	9.779	942		missing	missing
2002	299	1100	103	19.703	1.638	18.065	9.07	5.941	942		mist	4
2002	299	1200	103	23.425	3.057	20.368	15.01	9.779	428		mist	5
2002	299	1300	103	20.045	1.98	18.065	10.96	5.941	125			8
2002	299	1400	103	17.694	1.176	16.518	7.12	3.364	563			10
2002	299	1500	103	17.295	1.019	16.276	6.26	2.959	62			10
2002	299	1600	103	16.598	0.74	15.858	4.67	2.263	257			10
2002	299	1700	103	16.496	0.638	15.858	4.02	2.263	85			10
2002	299	1800	103	17.359	0.841	16.518	5.09	3.364	95			9.9
2002	299	1900	103	19.334	1.269	18.065	7.02	5.941	92			10
2002	299	2000	103	19.111	1.046	18.065	5.79	5.941	86			10
2002	299	2100	103	18.918	0.853	18.065	4.72	5.941	82			9
2002	299	2200	103	18.721	0.656	18.065	3.63	5.941	67			7
2002	299	2300	103	18.558	0.493	18.065	2.73	5.941	59			7
2002	300	0	103	18.445	0.38	18.065	2.10	5.941	52			6.8
				20.20	1.683	18.519	9.09	6.698	313.79	0.54		

*% change based on background from IMPROVE transmissometer at Badlands NP (if >50 1/Mm)

YEAR	DAY	HR	Model Extinctic by Species	RECEI	COORDIN. (km)	TYPE	BEXT (Mod)	BEXT (BKG)	BEXT (Total)	%CHANGE	F(RH)	bxSO4	bxNO3	bxOC	bxEC	bxPMC	bxPMF		
2002	300			0	103	118.471	-50.346	D	1.683	18.519	20.202	9.09	6.698	0.989	0.688	0.006	0	0	0

Attach
Revised CALPUFF Data Sheets
Wind Cave and Badlands 2002

JD 339 (340,0): Dec 5

YEAR	DAY	TIME	REC#	TOT EXT	MODEL EXT	FLAG BGRND	% CHANGE	RH-FAC	BGRND (FLAG/BAD)	%CHNG (FLAG/BAD)*	Rapid City Weather**	Rapid City Visibility (miles)
2002	339	100	120	18.396	0.712	17.684	4.03	5.307	942			7
2002	339	200	120	17.338	0.567	16.771	3.38	3.785	214			10
2002	339	300	120	17.059	0.708	16.351	4.33	3.085	168			10
2002	339	400	120	20.014	2.33	17.684	13.18	5.307	146			10
2002	339	500	120	17.971	1.62	16.351	9.91	3.085	117			10
2002	339	600	120	17.626	0.855	16.771	5.10	3.785	114			9.9
2002	339	700	120	17.262	0.911	16.351	5.57	3.085	108			10
2002	339	800	120	20.08	2.396	17.684	13.55	5.307	113			10
2002	339	900	120	22.255	1.887	20.368	9.26	12.429	93			10
2002	339	1000	120	22.954	2.586	20.368	12.70	12.429	67			10
2002	339	1100	120	16.214	0.412	15.802	2.61	2.17	65			10
2002	339	1200	120	15.923	0.31	15.613	1.99	1.855	56			9.9
2002	339	1300	120	15.963	0.35	15.613	2.24	1.855	15.613			10
2002	339	1400	120	15.655	0.195	15.46	1.26	1.599	15.46			10
2002	339	1500	120	15.453	0.115	15.338	0.75	1.397	15.338			10
2002	339	1600	120	15.673	0.213	15.46	1.38	1.599	105			10
2002	339	1700	120	15.787	0.327	15.46	2.12	1.599	139			10
2002	339	1800	120	15.681	0.303	15.378	1.97	1.463	15.378			9.9
2002	339	1900	120	16.102	0.397	15.705	2.53	2.008	15.705			10
2002	339	2000	120	17.92	0.992	16.928	5.86	4.047	16.928			10
2002	339	2100	120	22.838	2.47	20.368	12.13	12.429	20.368			10
2002	339	2200	120	17.093	0.165	16.928	0.97	4.047	16.928			10
2002	339	2300	120	16.94	0.012	16.928	0.07	4.047	16.928			10
2002	340	0	120	15.802	0	15.802	-	2.17	15.802			9.9
				17.667	0.868	16.799	5.17	4.162	108.81	0.80		

DEQ/AQD 000666

* % change based on background from IMPROVE transmissometer at Badlands NP (if >50 1/Mm)

YEAR	DAY	HR	RECEI	COORDIN. (km)	TYPE	BEXT (Mod)	BEXT (BKG)	BEXT (Total)	%CHANGE	F(RH)	bxSO4	bxNO3	bxOC	bxEC	bxPMC	bxPMF	
2002	340	0	120	115.824	-47.71 D	0.868	16.798	17.666	5.17		3.831	0.389	0.461	0.012	0	0	0.006

Attachment
 Revised CALPUFF Data Sheets
 Wind Cave and Badlands 2002

JD 299 (300,0): Oct 26 [Badlands]

YEAR	DAY	TIME	REC#	TOT EXT	MODEL EXT	FLAG BGRND	% CHANGE	RH-FAC	BGRND (FLAG/BAD)	%CHNG (FLAG/BAD)*	Rapid City Weather	Rapid City Visibility (miles)
2002	299	100	1	15.33	0.097	15.233	0.231	1.222	190		missing	missing
2002	299	200	1	21.197	0.829	20.368	2.102	9.779	228		missing	missing
2002	299	300	1	21.276	0.908	20.368	2.362	9.779	181		missing	missing
2002	299	400	1	21.42	1.052	20.368	2.533	9.779	189		missing	missing
2002	299	500	1	21.62	1.252	20.368	2.647	9.779	495		missing	missing
2002	299	600	1	21.81	1.442	20.368	2.704	9.779	498		missing	missing
2002	299	700	1	21.994	1.626	20.368	2.698	9.779	942		missing	missing
2002	299	800	1	22.379	2.011	20.368	2.964	9.779	495		missing	missing
2002	299	900	1	22.619	2.251	20.368	3.043	9.779	376		missing	missing
2002	299	1000	1	22.869	2.501	20.368	2.938	9.779	942		missing	missing
2002	299	1100	1	19.739	1.674	18.065	1.586	5.941	942		mist	4
2002	299	1200	1	23.295	2.927	20.368	2.996	9.779	428		mist	5
2002	299	1300	1	19.795	1.73	18.065	1.95	5.941	125			8
2002	299	1400	1	17.451	0.933	16.518	1.164	3.364	563			10
2002	299	1500	1	17.007	0.731	16.276	1.013	2.959	62			10
2002	299	1600	1	16.339	0.481	15.858	0.74	2.263	257			10
2002	299	1700	1	16.245	0.387	15.858	0.641	2.263	85			10
2002	299	1800	1	17.001	0.483	16.518	0.85	3.364	95			9.9
2002	299	1900	1	18.762	0.697	18.065	1.288	5.941	92			10
2002	299	2000	1	18.623	0.558	18.065	1.066	5.941	86			10
2002	299	2100	1	18.511	0.446	18.065	0.872	5.941	82			9
2002	299	2200	1	18.403	0.338	18.065	0.673	5.941	67			7
2002	299	2300	1	18.319	0.254	18.065	0.507	5.941	59			7
2002	300	0	1	18.261	0.196	18.065	1.08	5.941	52			6.8
				19.59	1.075	18.519	5.81	6.698	313.79	0.34		

DEQ/AQD 000667

* % change based on background from IMPROVE transmissometer at Badlands NP (if >50 1/Mm)

Model Extinct by		Species		RECEI COORDIN. (km)		TYPE	BEXT (Mod)	BEXT (BKG)	BEXT (Total)	%CHANGE	F(RH)	bxSO4	bxNO3	bxOC	bxEC	bxPMC	bxPMF
YEAR	DAY	HR															
2002	300		0	1	200.083	-23.183 D	1.075	18.519	19.594	5.81	6.698	0.631	0.441	0.003	0	0	0

JD 300 (301,0): Oct 27

YEAR	DAY	TIME	REC#	TOT EXT	MODEL EXT	FLAG BGRND	% CHANGE	RH-FAC	Billings Weather	Billings VR	Sheridan Weather	Sheridan VR	Sheridan (km)	FLAG or Method7 BGRND*	% CHANGE (Method 7)
2002	300	100	1843	17.668	1.15	16.518	6.96	3.364		10+		10+		16.518	
2002	300	200	1843	18.373	1.445	16.928	8.54	4.047		10+		10+		16.928	
2002	300	300	1843	18.481	1.553	16.928	9.17	4.047		10+		10+		16.928	
2002	300	400	1843	20.535	2.47	18.065	13.67	5.941		10+		10+		18.065	
2002	300	500	1843	18.006	1.488	16.518	9.01	3.364		10+		10+		16.518	
2002	300	600	1843	20.73	2.665	18.065	14.75	5.941		9.9		9.9		18.065	
2002	300	700	1843	24.662	4.294	20.368	21.08	9.779		10+		10+		20.368	
2002	300	800	1843	24.514	4.146	20.368	20.36	9.779		10+		10+		20.368	
2002	300	900	1843	17.615	1.339	16.276	8.23	2.959		10+		10+		16.276	
2002	300	1000	1843	16.436	0.789	15.647	5.04	1.911		10+		10+		15.647	
2002	300	1100	1843	16.184	0.636	15.548	4.09	1.747		10+		10+		15.548	
2002	300	1200	1843	15.666	0.385	15.281	2.52	1.302		9.9		9.9		15.281	
2002	300	1300	1843	15.524	0.282	15.242	1.85	1.237		10+		10+		15.242	
2002	300	1400	1843	15.444	0.227	15.217	1.49	1.196		10+		10+		15.217	
2002	300	1500	1843	15.379	0.188	15.191	1.24	1.153		10+		10+		15.191	
2002	300	1600	1843	15.278	0.142	15.136	0.94	1.06		10+		10+		15.136	
2002	300	1700	1843	15.274	0.099	15.175	0.65	1.125		10+		10+		15.175	
2002	300	1800	1843	15.424	0.069	15.355	0.45	1.424		9.9		9.9		15.355	
2002	300	1900	1843	16.346	0.07	16.276	0.43	2.959		10+		10+		16.276	
2002	300	2000	1843	15.811	0.009	15.802	0.06	2.17		10+		10+		15.802	
2002	300	2100	1843	17.124	0.008	17.116	0.05	4.359		10+		10+		17.116	
2002	300	2200	1843	16.281	0.005	16.276	0.03	2.959		10+		10+		16.276	
2002	300	2300	1843	16.523	0.005	16.518	0.03	3.364		10+		10+		16.518	
2002	301	0	1843	16.522	0.004	16.518	0.02	3.364		9.9		9.9		16.518	
				17.492	0.978	16.514	5.92	3.356						16.514	5.92

* When fog/precip, etc. is observed, BGRND (1/Mm) = 3912/VR(km). CALPOST Method 7.

YEAR	DAY	HR	RECE	COORDIN (km)	TYPE	BEXT(Mod)	BEXT(BKG)	BEXT(Total)	%CHANGE(F(RH))	bxSO4	bxNO3	bxOC	bxEC	bxPMC	bxPMF		
2002	301	0	1843	-96.809	167.715 D		0.978	16.514	17.491	5.92	3.356	0.549	0.422	0.006	0	0	0.001

DEQA/QAD 000668

JD 82 (83,0): Mar 23

YEAR	DAY	TIME	REC#	TOT EXT	MODEL EXT	FLAG BGRND	% CHANGE	RH-FAC	Billings Weather	Billings VR	Sheridan Weather	Sheridan VR	Sheridan (km)	FLAG or Method7 BGRND*	CHANGE (Method 7)
2002	82	100	930	18.065	0	18.065	-	5.941		10+		10+		18.065	
2002	82	200	930	17.116	0	17.116	-	4.359		10+		8		17.116	
2002	82	300	930	17.116	0	17.116	-	4.359		10+		8		17.116	
2002	82	400	930	17.159	0.043	17.116	0.25	4.359		10+		7		17.116	
2002	82	500	930	17.124	0.195	16.928	1.16	4.047		10+		9		16.928	
2002	82	600	930	16.96	0.899	16.061	5.60	2.601		9.9	mist	6	9.7	405	
2002	82	700	930	19.435	3.577	15.858	22.56	2.263		10+	mist	5	8.0	486	
2002	82	800	930	21.675	5.614	16.061	34.95	2.601		10+	mist	6	9.7	405	
2002	82	900	930	23.934	3.566	20.368	17.51	9.779		10+	mist	5	8.0	486	
2002	82	1000	930	22.79	2.422	20.368	11.89	9.779		10+		10+		20.368	
2002	82	1100	930	17.684	1.826	15.858	11.51	2.263		10+		7		15.858	
2002	82	1200	930	16.863	0.802	16.061	4.99	2.601		9.9		9.9		16.061	
2002	82	1300	930	16.629	0.568	16.061	3.54	2.601		10+		10+		16.061	
2002	82	1400	930	17.815	0.499	17.116	2.92	4.359		10+		10+		17.116	
2002	82	1500	930	16.376	0.315	16.061	1.96	2.601		10+		10+		16.061	
2002	82	1600	930	16.806	0.288	16.518	1.74	3.364		10+		9		16.518	
2002	82	1700	930	16.769	0.251	16.518	1.52	3.364		10+		10+		16.518	
2002	82	1800	930	16.024	0.222	15.802	1.40	2.17		9.9		9.9		15.802	
2002	82	1900	930	18.226	0.161	18.065	0.89	5.941		10+				18.065	
2002	82	2000	930	16.736	0.218	16.518	1.32	3.364	sight, continuous fall of snowflakes	6		10+		16.518	
2002	82	2100	930	16.762	0.244	16.518	1.48	3.364	sight, continuous fall of snowflakes, mist	5		7		16.518	
2002	82	2200	930	16.447	0.465	15.982	2.91	2.469	sight, continuous fall of snowflakes, mist	3	sight continuous fall of snowflakes, mist	3	4.8	810	
2002	82	2300	930	18.489	0.424	18.065	2.35	5.941	mist, slight, continuous fall of snowflakes	2		5	8.0	486	
2002	83	0	930	18.292	0.227	18.065	1.26	5.941		9.9	sight continuous fall of snowflakes, mist	3	4.8	810	
				17.962	0.951	17.011	5.59	4.185					0.46	174.050	0.55

DEQ/AQD 000669

YEAR	DAY	HR	RECE	COORDIN (km)	SPECIES	TYPE	BEXT(Mod)	BEXT(BKG)	BEXT(Total)	%CHANGE F(RH)	bxSO4	bxNO3	bxOC	bxEC	bxPMC	bxPMF		
2002	83	0	930	-108.576	166.812	D	0.951	17.011		17.962	5.59	4.185	0.458	0.481	0.007	0	0	0.004

Attachment
Revised CALPUFF Data Sheets
Northern Canada
2002

JD 66 (67.0): Mar 7

DEQ/AQD 000670

YEAR	DAY	TIME	REC#	TOT EXT	MODEL EXT	FLAG BGRND	% CHANGE	RH-FAC	Billings Weather	Billings VR	Sheridan Weather	Sheridan VR	Sheridan (km)	FLAG or Method7 BGRND*	% CHANGE (Method 7)
2002	66	100	2009	22.509	5.581	16.928	32.97	4.047	slight, continuous fall of snowflakes	10+		7		16.928	
2002	66	200	2009	19.501	3.293	16.208	20.32	2.846	slight, continuous fall of snowflakes	10+				16.208	
2002	66	300	2009	20.666	3.738	16.928	22.08	4.047	slight, continuous fall of snowflakes	7		8		16.928	
2002	66	400	2009	20.082	3.134	16.928	18.51	4.047	slight, continuous fall of snowflakes, mist	5		4	6.4	608	
2002	66	500	2009	18.127	1.692	16.435	10.30	3.224	slight, continuous fall of snowflakes	10+		6	9.7	405	
2002	66	600	2009	17.071	0.72	16.351	4.40	3.085	slight, continuous fall of snowflakes	9.9		6	9.7	405	
2002	66	700	2009	16.824	0.473	16.351	2.89	3.085	slight, continuous fall of snowflakes	10+		3	4.8	810	
2002	66	800	2009	16.697	0.346	16.351	2.12	3.085	slight, continuous fall of snowflakes	7		2	3.2	1215	
2002	66	900	2009	16.006	0.148	15.858	0.93	2.263	slight, continuous fall of snowflakes	3		0.8	1.3	3039	
2002	66	1000	2009	16.237	0.097	16.14	0.60	2.733	moderate, continuous fall of snowflakes, fog, depositing rime, sky visible	0.5		1.5	2.4	1621	
2002	66	1100	2009	15.902	0.044	15.858	0.28	2.263	slight, continuous fall of snowflakes, mist	1.5	Haze	5	8.0	486	
2002	66	1200	2009	15.758	0.022	15.736	0.14	2.06	slight, continuous fall of snowflakes, mist	1		9.9		15.736	
2002	66	1300	2009	15.559	0.011	15.548	0.07	1.747		7		10+		15.548	
2002	66	1400	2009	15.554	0.006	15.548	0.04	1.747		10+		10+		15.548	
2002	66	1500	2009	15.74	0.004	15.736	0.03	2.06	slight, continuous fall of snowflakes	0.8		10+		15.736	
2002	66	1600	2009	15.738	0.002	15.736	0.01	2.06	slight, continuous fall of snowflakes, mist	1		10+		15.736	
2002	66	1700	2009	15.737	0.001	15.736	0.01	2.06	slight, continuous fall of snowflakes	5		10+		15.736	
2002	66	1800	2009	15.651	0.004	15.647	0.03	1.911	slight, continuous fall of snowflakes	9.9		9.9		15.647	
2002	66	1900	2009	15.746	0.01	15.736	0.06	2.06	slight, continuous fall of snowflakes	1		10+		15.736	
2002	66	2000	2009	15.746	0.01	15.736	0.06	2.06	slight, continuous fall of snowflakes, mist	6		10+		15.736	
2002	66	2100	2009	16.95	0.022	16.928	0.13	4.047	slight, continuous fall of snowflakes, mist	5		4	6.4	608	
2002	66	2200	2009	16.954	0.026	16.928	0.15	4.047	slight, continuous fall of snowflakes	9		3	4.8	810	
2002	66	2300	2009	16.959	0.031	16.928	0.18	4.047	slight, continuous fall of snowflakes	10+		4	6.4	608	
2002	67	0	2009	16.164	0.024	16.14	0.15	2.733	slight, continuous fall of snowflakes	6.8		6	9.7	405	
					0.810	16.184	5.0	2.807						467.132	0.17

YEAR	DAY	HR	Mode ExtIncl by RECD	COORDIN (km)	SPECIES	TYPE	BEXT(Mod)	BEXT(BKG)	BEXT(Total)	%CHANGE(F(RH))	bxSO4	bxNO3	bxOC	bxEC	bxPMC	bxPMF		
2002	67	0	2009	-151.518	147.278	D	0.81	16.184		16.994	5	2.807	0.415	0.385	0.009	0	0	0.001

JD 68 (69.0): March 9 [Wind Cave]

YEAR	DAY	TIME	REC#	TOT EXT	MODEL EXT	FLAG BGRND	% CHANGE	RH-FAC	BGRND (FLAG/BAD)**	%CHNG (FLAG/BAD)**	Rapid City Weather	Rapid City Visibility (miles)	Rapid City Visibility (km)	FLAG or Method7 BGRND**	% CHANGE (Method 7)
2003	68	100	101	19.624	2.853	16.771	17.01	3.785	*		light snow	9	14.5	270	
2003	68	200	101	19.619	2.848	16.771	16.98	3.785	*					16.771	
2003	68	300	101	19.307	2.536	16.771	15.12	3.785	*					16.771	
2003	68	400	101	18.817	2.046	16.771	12.20	3.785	*					16.771	
2003	68	500	101	18.321	1.55	16.771	9.24	3.785	*					16.771	
2003	68	600	101	16.747	0.686	16.061	4.27	2.601	*					16.061	
2003	68	700	101	16.67	0.609	16.061	3.79	2.601	*					16.061	
2003	68	800	101	22.855	2.487	20.368	12.21	9.779	*					20.368	
2003	68	900	101	17.965	1.194	16.771	7.12	3.785	*		mist	4	6.4	608	
2003	68	1000	101	17.998	1.227	16.771	7.32	3.785	*		light snow	7	11.3	347	
2003	68	1100	101	16.474	0.738	15.736	4.69	2.06	*		light snow	4	6.4	608	
2003	68	1200	101	16.593	0.857	15.736	5.45	2.06	*		light snow	9	14.5	270	
2003	68	1300	101	16.667	0.931	15.736	5.92	2.06	*					15.736	
2003	68	1400	101	16.737	1.001	15.736	6.36	2.06	*		haze	5	8.0	486	
2003	68	1500	101	16.404	0.856	15.548	5.51	1.747	*		haze	6	9.7	405	
2003	68	1600	101	17.395	1.255	16.14	7.78	2.733	*		light snow	3	4.8	810	
2003	68	1700	101	16.233	0.685	15.548	4.41	1.747	*					16.140	
2003	68	1800	101	16.695	0.781	15.914	4.91	2.356	*					15.548	
2003	68	1900	101	18.228	1.3	16.928	7.68	4.047	*		light snow, mist	6	9.7	405	
2003	68	2000	101	18.226	1.298	16.928	7.67	4.047	50					16.928	
2003	68	2100	101	18.208	1.28	16.928	7.56	4.047	51		light snow, mist	4	6.4	51	
2003	68	2200	101	18.172	1.244	16.928	7.35	4.047	16.928		light snow	8	12.9	304	
2003	68	2300	101	18.158	1.23	16.928	7.27	4.047	16.928					16.928	
2003	69	0	101	19.31	1.626	17.684	9.19	5.307	17.684					17.684	
				17.98	1.38	16.596	8.31	3.493						199.294	0.69

DEQA/QD 000671

* transmissometer data missing

** when fog/precip, etc. is observed, BGRND (1/Mm) = 3912/VR(km). CALPOST Method 7 or

% change based on background from IMPROVE transmissometer at Badlands NP (if >50 1/Mm)

YEAR	DAY	HR	Model Extinct by RECF	Species COORDIN. (km)	TYPE	BEXT(Mod)	BEXT(BKG)	BEXT(Total)	%CHANGE	F(RH)	bxSO4	bxNO3	bxOC	bxEC	bxPMC	bxPMF
2003	69	0	101	117.172	-50.371 D	1.38	16.596	17.98	8.31		3.493	0.738	0.629	0.011	0	0.002

Attachment 7
 Revised CALPUFF Data Sheets
 Wind Cave and Badlands 2003

JD 345 (346.0): Dec 11 [Wind Cave]

YEAR	DAY	TIME	REC#	TOT EXT	MODEL EXT	FLAG BGRND	% CHANGE	RH-FAC	(FLAG/BAD)	%CHNG (FLAG/BAD)*	Rapid City Weather	Rapid City Visibility (miles)
2003	345	100	267	18.18	0.115	18.065	0.64	5.941	942		light snow	3
2003	345	200	267	18.156	0.091	18.065	0.50	5.941	942		light snow, mist	2.5
2003	345	300	267	18.148	0.083	18.065	0.46	5.941	942			
2003	345	400	267	16.48	0.045	16.435	0.27	3.224	942			
2003	345	500	267	18.151	0.086	18.065	0.48	5.941	469			
2003	345	600	267	16.987	0.059	16.928	0.35	4.047	128			
2003	345	700	267	18.153	0.088	18.065	0.49	5.941	216		light snow	9
2003	345	800	267	18.154	0.089	18.065	0.49	5.941	178			
2003	345	900	267	18.159	0.094	18.065	0.52	5.941	229			
2003	345	1000	267	18.199	0.134	18.065	0.74	5.941	180		light snow, mist	4
2003	345	1100	267	18.296	0.231	18.065	1.28	5.941	469			
2003	345	1200	267	18.471	0.406	18.065	2.25	5.941	133			
2003	345	1300	267	16.781	0.346	16.435	2.11	3.224	117			
2003	345	1400	267	16.933	0.498	16.435	3.03	3.224	100			
2003	345	1500	267	16.416	0.502	15.914	3.15	2.356	90			
2003	345	1600	267	16.544	0.63	15.914	3.96	2.356	88			
2003	345	1700	267	17.564	1.129	16.435	6.87	3.224	98			
2003	345	1800	267	20.808	2.743	18.065	15.18	5.941	98			
2003	345	1900	267	19.265	2.337	16.928	13.81	4.047	93		mist	1.7
2003	345	2000	267	27.234	6.866	20.368	33.71	9.779	84		mist	1.2
2003	345	2100	267	20.271	3.343	16.928	19.75	4.047	82			
2003	345	2200	267	22.597	4.913	17.684	27.78	5.307	90		mist	1
2003	345	2300	267	22.824	5.14	17.884	29.07	5.307	77			
2003	346	0	267	22.411	4.727	17.684	26.73	5.307	75			
				18.97	1.446	17.52	8.25	5.033	285.92	0.51		

DEQ/AQD 000672

* % change based on background from IMPROVE transmissometer at Badlands NP (if >50 1/Mm)

YEAR	DAY	HR	Model Extinct by RECF	Species COORDIN. (km)	TYPE	BEXT (Mod)	BEXT (BKG)	BEXT (Total)	%CHANGE	F(RH)	bxSO4	bxNO3	bxOC	bxEC	bxPMC	bxPMF
2003	346	0	267	116.954	-38.735 D	1.446	17.52	18.966	8.25		5.033	0.812	0.625	0.007	0	0.001

JD 309 (310,0): Nov 5th [Wind Cave]

YEAR	DAY	TIME	REC#	TOT EXT	MODEL EXT	FLAG BGRND	% CHANGE	RH-FAC	(FLAG/BAD)	%CHNG (FLAG/BAD)*	Rapid City Weather	Rapid City Visibility (miles)
2003	309	100	101	16.442	0.302	16.14	1.87	2.733	52			10
2003	309	200	101	16.469	0.329	16.14	2.04	2.733	52			10
2003	309	300	101	16.499	0.359	16.14	2.22	2.733	16.14			10
2003	309	400	101	16.54	0.4	16.14	2.48	2.733	52			10
2003	309	500	101	16.599	0.459	16.14	2.84	2.733	52			10
2003	309	600	101	16.675	0.535	16.14	3.31	2.733	55			9.9
2003	309	700	101	18.903	1.219	17.684	6.89	5.307	55			10
2003	309	800	101	17.284	0.933	16.351	5.71	3.085	57			10
2003	309	900	101	17.521	1.17	16.351	7.16	3.085	58			10
2003	309	1000	101	18.805	1.877	16.928	11.09	4.047	53			10
2003	309	1100	101	16.922	1.153	15.769	7.31	2.115	52			10
2003	309	1200	101	17.353	1.439	15.914	9.04	2.356	52			9.9
2003	309	1300	101	16.808	1.229	15.579	7.89	1.798	53			10
2003	309	1400	101	16.948	1.369	15.579	8.79	1.798	53			10
2003	309	1500	101	16.992	1.413	15.579	9.07	1.798	55			10
2003	309	1600	101	16.799	1.308	15.491	8.44	1.652	57			10
2003	309	1700	101	16.855	1.276	15.579	8.19	1.798	60			10
2003	309	1800	101	18.61	2.175	16.435	13.23	3.224	59			9.9
2003	309	1900	101	17.314	1.456	15.858	9.18	2.263	61			10
2003	309	2000	101	18.26	1.909	16.351	11.68	3.085	67			10
2003	309	2100	101	20.961	3.277	17.684	18.53	5.307	71			10
2003	309	2200	101	18.277	1.926	16.351	11.78	3.085	76			10
2003	309	2300	101	19.127	2.356	16.771	14.05	3.785	81			10
2003	310	0	101	17.228	1.37	15.858	8.64	2.263	75			9.9
				17.508	1.302	16.206	8.03	2.844	57.26	2.27		

DEQA/QD 000673

* % change based on background from IMPROVE transmissometer at Badlands NP (if >50 1/Mm)

YEAR	DAY	HR	Model Extinct by RECF	Species COORDIN. (km)	TYPE	BEXT(Mod)	BEXT(BKG)	BEXT(Total)	%CHANGE	F(RH)	bxSO4	bxNO3	bxOC	bxEC	bxPMC	bxPMF
2003	310	0	101	117.172	-50.371 D	1.302	16.206	17.508	8.03		2.844	0.819	0.473	0.009	0	0.001

Attachment 3
 Revised CALPUFF Model Data Sheets
 Wind Cave and Badlands 2003

JD 346 (347,0): Dec 12 [Badlands]

YEAR	DAY	TIME	REC#	TOT EXT	MODEL EXT	FLAG BGRND	% CHANGE	RH-FAC	(FLAG/BAD)	%CHNG (FLAG/BAD)*	Rapid City Weather	Rapid City Visibility (miles)
2003	346	100	28	16.624	0.563	16.061	3.51	2.601	98			
2003	346	200	28	17.823	1.052	16.771	6.27	3.785	111		mist	2.5
2003	346	300	28	17.451	1.1	16.351	6.73	3.085	113			10
2003	346	400	28	18.501	1.73	16.771	10.32	3.785	140			10
2003	346	500	28	18.932	2.161	16.771	12.89	3.785	192			10
2003	346	600	28	18.408	2.057	16.351	12.58	3.085	751			9.9
2003	346	700	28	18.514	2.163	16.351	13.23	3.085	403			10
2003	346	800	28	19.249	2.478	16.771	14.78	3.785	180			10
2003	346	900	28	18.876	2.105	16.771	12.55	3.785	104			10
2003	346	1000	28	24.176	3.807	20.368	18.69	9.779	82			10
2003	346	1100	28	18.137	1.209	16.928	7.14	4.047	68			10
2003	346	1200	28	15.851	0.36	15.491	2.32	1.652	67			9.9
2003	346	1300	28	15.88	0.267	15.613	1.71	1.855	61			10
2003	346	1400	28	15.766	0.153	15.613	0.98	1.855	54			10
2003	346	1500	28	15.706	0.093	15.613	0.60	1.855	942			10
2003	346	1600	28	15.66	0.047	15.613	0.30	1.855	942			10
2003	346	1700	28	16.971	0.043	16.928	0.25	4.047	79			10
2003	346	1800	28	16.947	0.019	16.928	0.11	4.047	85			9.9
2003	346	1900	28	18.076	0.011	18.065	0.06	5.941	99			10
2003	346	2000	28	20.373	0.005	20.368	0.02	9.779	110			10
2003	346	2100	28	20.368	0	20.368	-	9.779	135			
2003	346	2200	28	20.368	0	20.368	-	9.779	417			8
2003	346	2300	28	17.684	0	17.684	-	5.307	333		mist	1.2
2003	347	0	28	16.928	0	16.928	-	4.047	141			9.9
				18.05	0.89	17.16	5.2	4.434	237.79	0.38		

DEQ/AQD 000674

*% change based on background from IMPROVE transmissometer at Badlands NP (if >50 1/Mm)

YEAR	DAY	HR	Model Extincti	Species	RECEP COORDIN. (km)	TYPE	BEXT (Mod)	BEXT (BKG)	BEXT (Total)	%CHANGE	F(RH)	bxSO4	bxNO3	bxOC	bxEC	bxPMC	bxPMF
2003	347	0	28	227.093	-18.671	D	0.89	17.16	18.053	5.2	4.434	0.496	0.39	0.006	0	0	0.001

Attachment 3
 Revised CALPUFF Data Sheets
 Northern Cheyenne 2003

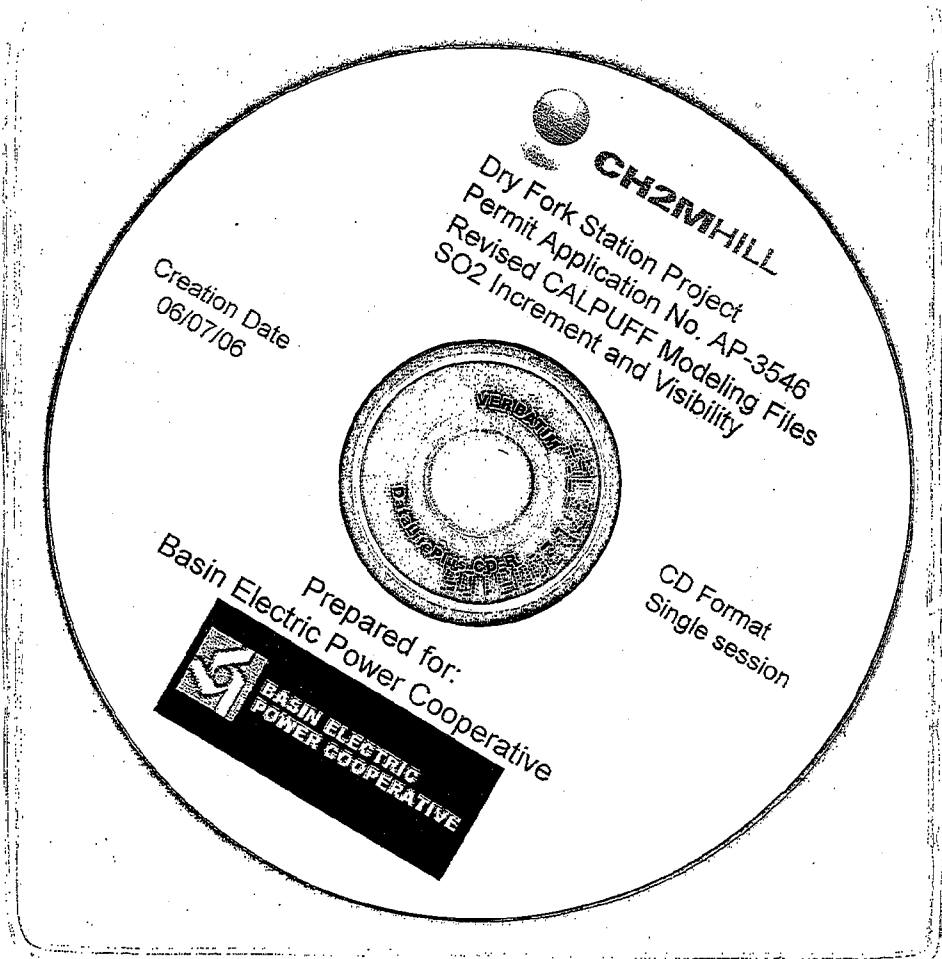
JD 307 (308,0): November 3

DEQA/QD 000675

YEAR	DAY	TIME	REC#	TOT EXT	MODEL EXT	FLAG BGRND	% CHANGE	RH-FAC	Billings Weather	Billings VR	Sheridan Weather	Sheridan VR	Sheridan VR (km)	FLAG or Method7 BGRND*	% CHANGE (Method 7)
2003	307	100	1879	18.159	1.883	16.276	11.57	2.959						16.276	
2003	307	200	1879	20.63	3.514	17.116	20.53	4.359	light snow	9				17.116	
2003	307	300	1879	21.092	3.976	17.116	23.23	4.359	light snow	10				17.116	
2003	307	400	1879	28.39	8.022	20.368	39.39	9.779	light snow	9	mist	3	4.8	810	
2003	307	500	1879	28.389	8.021	20.368	39.38	9.779	light snow	9	mist	1.7	2.7	1430	
2003	307	600	1879	29.604	9.236	20.368	45.35	9.779	light snow	8.7	mist	2.5	4.0	972	
2003	307	700	1879	23.653	5.588	18.065	30.93	5.941	light snow	9	mist	2.5	4.0	972	
2003	307	800	1879	25.198	7.133	18.065	39.49	5.941			mist	2.5	4.0	972	
2003	307	900	1879	27.383	9.318	18.065	51.58	5.941			mist	1.5	2.4	1621	
2003	307	1000	1879	29.216	11.151	18.065	61.73	5.941			mist	2	3.2	1215	
2003	307	1100	1879	31.127	13.062	18.065	72.31	5.941			mist	2.5	4.0	972	
2003	307	1200	1879	43.077	22.709	20.368	111.49	9.779						20.368	
2003	307	1300	1879	41.657	21.289	20.368	104.52	9.779			mist	2	3.2	1215	
2003	307	1400	1879	41.016	20.648	20.368	101.37	9.779						20.368	
2003	307	1500	1879	40.189	19.821	20.368	97.31	9.779						20.368	
2003	307	1600	1879	39.037	18.669	20.368	91.66	9.779						20.368	
2003	307	1700	1879	24.688	7.572	17.116	44.24	4.359						17.116	
2003	307	1800	1879	21.824	5.306	16.518	32.12	3.364						16.518	
2003	307	1900	1879	20.401	4.125	16.276	25.34	2.959						16.276	
2003	307	2000	1879	31.572	11.204	20.368	55.01	9.779	light snow, mist	5				20.368	
2003	307	2100	1879	32.63	12.262	20.368	60.20	9.779	light snow, mist	1				20.368	
2003	307	2200	1879	31.092	10.724	20.368	52.65	9.779	light snow, mist	1				20.368	
2003	307	2300	1879	29.819	9.451	20.368	46.40	9.779	light snow, mist	2.5	freezing rain, mist	5	8.0	486	
2003	308	0	1879	22.432	4.367	18.065	24.17	5.941	light snow, mist	3	freezing rain	8	12.9	304	
				29.261	10.38	18.884	54.95	7.31						467.254	2.2

* When fog/precip, etc. is observed, BGRND (1/Mm) = 3912/VR(km). CALPOST Method 7.

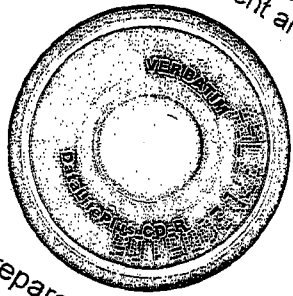
YEAR	DAY	HR	Model Extinct by RECF	Species COORDIN. (km)	TYPE	BEXT (Mod)	BEXT (BKG)	BEXT (Total)	%CHANG F(RH)	bxSO4	bxNO3	bxOC	bxEC	bxPMC	bxPMF
2003	308	0	1879	-126.282 151.458	D	10.38	18.884	29.261	54.95	7.31	6.019	4.293	0.047	0.001	0 0.017



CH2MHILL

Dry Fork Station Project
Permit Application No. AP-3546
Revised CALPUFF Modeling Files
SO2 Increment and Visibility

Creation Date
06/07/06



CD Format
Single session

Prepared for:
Basin Electric Power Cooperative

