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 P

MEMORANDUM

TO: File (AP-3546)

FROM: Stewart Griner SG

THROUGH: Chad Schlichtemeier

DATE: April 24, 2007

RE: Phone conversation with Jerry Menge regarding comments received

Chad and I called Jerry Menge on Friday, April 20, 2007 to discuss the comments received on the proposed permit for Basin Electric's Dry Fork Station. The following items were discussed:

1) **Limit for NH_3** – We asked Jerry if 10 ppm is a workable permit limit based on a 3 hr test using EPA Conditional Test Method 27. Jerry indicated that 10 ppm is a workable permit limit because their goal is 5 ppm and there may be issues with corrosion and visible emissions if NH_3 emissions are above 7 ppm.

2) **SO_2** – We asked Jerry to provide additional information explaining any differences between Dry Fork Station and Newmont Nevada Energy Investment's TS Power Plant. The Newmont Nevada permit limits SO_2 to 0.065 lb/MMBtu, 24 hour average. Jerry indicated that he may also provide information explaining why the TS Power Plant may not be able to comply with the proposed limits.

3) **CEM for CO** – We discussed using a CEM for CO emissions and asked if the CO number in the application is a maximum number or an average number. Jerry indicated that they were not planning to use a CEM and will provide information on the basis for the CO number in the application.

4) **IGCC** – We asked Jerry to provide information explaining why Basin Electric selected a PC Boiler rather than an IGCC.

5) **Supercritical and Ultra-Supercritical boilers** – We asked Jerry to provide information explaining why Basin selected a subcritical boiler rather than a supercritical or ultra-supercritical boiler.

6) **Hg Control** – We discussed installation of Hg controls and the one year mercury optimization study. We explained that we assumed Basin would install a control system up front and use it to perform a full scale mercury optimization study. We asked Jerry if they plan to perform a full scale or a pilot scale test for the optimization study and when they plan to install a full scale control system. We also asked Jerry to provide any additional information on the level of mercury control that they consider available at this time.

7) **Soils and Vegetation** – Some of the comments indicated that a complete inventory of species and an evaluation of effects from pollutants at levels below the NAAQS and an evaluation of effects from pollutants for which there are no NAAQS (e.g. fluoride, sulfuric acid, Hg, and Be) should be performed. We asked Jerry to provide additional information supporting the soils and vegetation analysis that was performed.

8) **Sulfuric Acid Mist** – Basin comments indicated that the limit for H_2SO_4 should be raised to 0.0045 lb/MMBtu due to vendor guarantees and test variability. Other comments received indicated that the limit should be lowered due to permits such as the one for Newmont Nevada Energy Investment's TS Power Plant which limits H_2SO_4 to 0.001 lb/MMBtu. During this conversation, Jerry noted that the modeling for Dry Fork Station was performed at 0.0045 lb/MMBtu. We asked Jerry to justify a permit limit using BACT rather than test variability.