

BEFORE THE ENVIRONMENTAL QUALITY COUNCIL
STATE OF WYOMING

In the Matter of:)
Basin Electric Power Cooperative) Docket No. 10-2802
Air Quality Permit No. MD-6047)
BART Permit: Laramie River Station)

RESPONSE TO BASIN ELECTRIC'S MOTION FOR SUMMARY JUDGMENT

Basin Electric Comments, dated 8/5/09

EXHIBIT 17

**BASIN ELECTRIC
POWER COOPERATIVE**

1717 EAST INTERSTATE AVENUE
BISMARCK, NORTH DAKOTA 58503-0584
PHONE 701-223-0441
FAX: 701/224-5338



August 5, 2009

Mr. David Finley, Administrator
Air Quality Division
WY Department of Environmental Quality
122 West 25th Street
Herschler Building
Cheyenne, WY 82002



Dear Mr. Finley,

Basin Electric has reviewed the DEQ's Best Available Retrofit Technology (BART) Analysis for the Laramie River Station (LRS) and the Proposed Permit Conditions. We offer the following comments.

Basin Electric commits to comply with Proposed Permit Conditions 1 through 15. We continue to have the concerns previously expressed in this record. The standards set by the BART determination will be a challenge for each of the units at LRS to meet.

Regarding Condition 16, Basin Electric requests DEQ to revise the time for submitting a permit application for additional add-on NOx controls from six years prior to installation to two years prior to installation. New Low-NOx Burners will be installed on the units in 2012, 2013, and 2014. Observation and evaluation of the operation of the Low-NOx Burners will be required to determine the design of new add-on technology before the technology can be specified and be included in a permit application. The engineering and analyses required for the permit application may take several years to prepare an application. This additional time could also allow for the development of emerging technologies before we would need to make a commitment for a specific technology. At the present time, we are not sure that a retrofit NOx control system can be added to the LRS units that would meet the proposed limit of 0.07 lb/mmBtu on a 30-day rolling average. The additional time we are requesting may allow additional technologies to develop that may provide a greater chance of meeting 0.07 lb/mmBtu and at a lower cost and/or greater efficiency.

~~If you have any questions, please contact me at 701-557-5654 or Lyle Witham at 701-557-5652.~~

Sincerely,

Robert L. Erksen, P.E.
Sr. Environmental Compliance Administrator

cc: Chad Schlichtemeier, DEQ
Mike Fluharty
Dave Cummings
Lyle Witham

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