

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

DEQ/AQD's Request for Additional Info., dated 8/27/09

EXHIBIT 18



Department of Environmental Quality



To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.

Dave Freudenthal, Governor

John Corra, Director

August 27, 2009

Mr. Robert L. Eriksen
Environmental Compliance Administrator
Basin Electric Power Cooperative
1717 East Interstate Avenue
Bismarck, ND 58503-0564

Re: Response to Comments Received on BART
Application (AP-6047)

Dear Mr. Eriksen:

The Wyoming Air Quality Division has reviewed comments submitted during the public notice and public hearing for the Division's proposed BART determinations for the Laramie River Station (AP-6047) and requests that Basin Electric address the following items by close of business, Friday, September 11, 2009:

1. Please clarify whether Basin's BART analysis for SCR includes the application of LNB with OFA.

Referenced comment:

A) Page 1 of the National Park Service (NPS) comment letter dated August 4, 2009: NO_x Step 1 - IDENTIFY AVAILABLE RETROFIT CONTROL TECHNOLOGIES. Basin omitted the combination of Low-NO_x burners (LNB) plus over-fire air (OFA) plus SCR. Without this combination of technologies, Basin's cost analysis is fundamentally flawed.

2. Please provide supporting information that the proposed 0.07 lb/MMBtu, 30-day rolling average, NO_x emission limit for SCR represents the most stringent control option.

Referenced comments:

A) Page 2 of the National Park Service (NPS) comment letter dated August 4, 2009: NO_x Step 3 - EVALUATE EFFECTIVENESS OF REMAINING CONTROL TECHNOLOGIES. The ability of SCR to reduce emissions was consistently underestimated. Proposed NO_x limit for SCR (0.07 lb/MMBtu) is not low enough, SCR can achieve greater reductions. NPS suggests 0.06 lb/MMBtu for 30-day limit, 0.05 lb/MMBtu or lower for an annual limit.

B) Page 2 of the EPA Region 8 comment letter dated August 3, 2009: The most stringent control levels have not been evaluated for SNCR and SCR. Cost effectiveness is overestimated as a result.

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3. Please provide additional justification for the proposed 30-day rolling NO_x emission rates from the application of existing LNB with OFA and new LNB with OFA.

Referenced comment:

A) Page 7 of the EPA Region 8 comment letter dated August 3, 2009: NO_x Control Levels. EPA questions why separate evaluations of potential NO_x controls for Units 1-3 at the Laramie River Station all arrived at the same control level (0.23 lb/MMBtu) for different technologies. LNB, OFA, and a LNB/OFA combination are all listed with the same controlled rate.

4. Please provide additional justification of why SCR cannot be installed on any of the units within 5 years of SIP approval as BART.

Referenced comment:

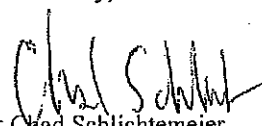
A) Page 8 of the Powder River Basin Resource Council, et al. comment letter dated August 4, 2009: SCR Installation. DEQ concluded that SCR should be installed on two of the Laramie River Station units as part of a "long-term strategy" by 2023. The basis for this major extension of the BART 5-year deadline is the "logistical challenge" that Basin Electric faces in upgrading its power plants to meet regional haze requirements. No facts supporting the extension are provided.

In addition to the four items above, Basin is welcome to address any received comments you deem appropriate. Additional responses are also due by close of business Friday, September 11, 2009.

On August 11, 2009 a transmittal letter and a CD containing electronic copies of BART comments received from the National Park Service, the Forest Service, EPA Region 8, and Powder River Basin Resource Council et al. were sent to Basin. An August 5, 2009 letter from the Powder River Basin Resource Council was not available for transmittal at that time. A hard copy of the letter is attached for your reference.

If you should have any questions, please feel free to contact this office.

Sincerely,



Chad Schlichtemeier
NSR Program Manager
Air Quality Division

attach: August 5, 2009, Powder River Basin Resource Council letter

cc: Glenn Spangler
File: AP-6047

ENCOURAGING RESPONSIBLE DEVELOPMENT TODAY - FOR TOMORROW

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Via hand-delivery

August 5, 2009

David A. Finley
Administrator, Division of Air Quality
Department of Environmental Quality
122 W. 25th St.
Cheyenne, Wyoming 82002



RE: COMMENTS ON DEQ REGIONAL HAZE BART DETERMINATIONS FOR WYOMING COAL-FIRED POWER PLANTS

Dear Mr. Finley,

Since the founding of our organization in 1973, one of the main issues we have worked on is the protection of Wyoming's air resources. First addressing the issue with coal strip mines and mine mouth power plants and later with coalbed methane and deep gas developments, our members have remained resolute in believing that one of the most important roles for our environmental agencies is to protect air quality.

Air quality has tremendous economic value in a state like Wyoming. Main sectors of our economy, such as agriculture, recreation, and tourism, depend on a high level of air quality. Thousands upon thousands of people come to Wyoming every year to visit our national parks and wilderness areas. These people will stop coming if they cannot see our mountain vistas or across our valleys and prairies. Additionally, the health of our citizens is directly related to the ~~air we breathe and nitrogen oxides, sulfur dioxide, and particulate matter~~ all increase the risk of lung disease, asthma, and related illnesses, which in turn increases both the private and public costs of health care. It is thus an economic choice to reduce regional haze-causing pollutants that drift into public lands, towns and cities, and agricultural areas.

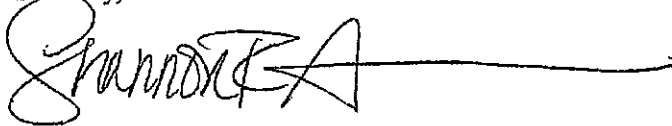
We understand that there are financial costs to reducing these haze-causing pollutants. However, we believe the benefits far outweigh the costs of strong control technology. PacifiCorp and its Wyoming subsidiary, Rocky Mountain Power, recognize the benefits of environmental stewardship as evidenced by recently launched demand-side management programs, pollution control technology upgrades at power plants, participation in Wyoming's carbon sequestration task force, and the development of renewable energy. We thank PacifiCorp for being a leader in the industry in terms of environmental management and we hope that leadership will transfer to the Dave Johnston permit under review today.

In particular, we believe PacifiCorp can be a leader by agreeing to install selective catalytic reduction to control nitrogen oxides emissions. SCR has tremendous potential to reduce NO_x emissions in a cost effective manner. As stated in our written comments submitted to the Department yesterday, we believe SCR is the best available retrofit technology and it should be required at Dave Johnston and the four other Wyoming power plants under consideration.

Wyoming's air quality is degrading to a level many of us have never seen in our lifetimes and it is high time to address the pollution caused by some of the oldest pollution sources in the state, such as the Dave Johnston plant. Dave Johnston has been an economic driver in our state for the past half century and we hope it will remain for at least that long. However, in order to do so, the plant has to come into step with the 2009 and the pollution reducing technology that is available today.

Thank you for your time and hard work on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon Anderson", followed by a long horizontal line extending to the right.

Shannon Anderson
Organizer, Powder River Basin Resource Council



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Facility Search Report - Criteria Air Pollutants - Facility Detail

Facility Name: PACIFICORP_DAVE JOHNSTON
Year: 2002

1 Facility selected
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Facility Search Report
Details For Selected Facility

PACIFICORP_DAVE JOHNSTON

Facility ID: 56009-5600900001

Mailing Address: 1591 TANK FARM ROAD, GLENROCK, WY 82637

SIC: 4911 - Electric services

Principal Pollutant: Sulfur Dioxide (19,980.10 tons per year)

Facility Emissions (2002)

Pollutant	Tons per Year
S02	19980
NOx	15023
PM10	1574
PM2.5	965
CO	963
VOC	115
NH3	58

Tons per Year

Facility Location: Converse Co, Wyoming

Square Marker Indicates Facility Location

Source: US EPA Office of Air and Radiation, HFI Database
Wednesday, August 5, 2009

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