

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 Information, dated 5/3/07

EXHIBIT 4



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

May 3, 2007

Dallas Wade, Plant Manager
Basin Electric Power Cooperative
P.O. Box 1346
Wheatland, Wyoming 82201

Re: Laramie River Station BART Analysis Documentation

Dear Mr. Wade:

Per Section IV. A. of the Guidelines for Best Available Retrofit Technology (BART) Determinations, Basin Electric Power Cooperative (Basin) must address six factors in analyzing appropriate BART controls for SO₂, NO_x and Particulate Matter: 1) identification of available technically feasible, retrofit options, 2) the costs of compliance, 3) the energy and non-air quality environmental impacts of compliance, 4) any pollution control equipment in use or in existence at the source, 5) the remaining useful life of the source, and 6) the degree of improvement in visibility which may reasonably be anticipated to result from the use of such technology. The Division's October 2, 2006 letter required Basin to provide "some sort of "minimal" assessment of the first five BART factors in order to evaluate implementation of the presumptive levels of control at the Laramie River Station, and Basin has complied with this requirement.

In discussing the requirements of the BART analysis with EPA and other Air Managers involved in Regional Haze, the Division has determined that additional information pertaining to your BART analysis must be submitted, even though you have committed to implementing the presumptive levels of control for the subject to BART sources at Laramie River Station. Specifically, the additional information requested in this letter consists of documenting:

- 1) control technologies that were investigated
- 2) potential reduction in NO_x, SO₂, and Particulate Matter emission rates resulting from control technologies that were evaluated
- 3) incremental and total costs per ton of pollutant reduced as a result of retrofitting the specified control technologies,
- 4) degree of visibility improvement, inclusive of:
 - a) model predicted maximum and highest eighth high (98th percentile) deciview values and the number of days greater than 0.5 deciview due to current controls in place (baseline).

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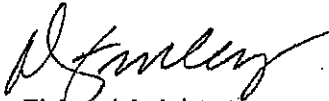
AQD LRS BART
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b) model predicted maximum and 98th percentile deciview values, days greater than 0.5 deciview, and associated incremental and total costs per deciview and per days greater than 0.5 deciview that would result from the implementation of each control technology that was evaluated.

Additionally, the Division will require that Basin submit five (5) hard copies of the BART engineering analysis, an electronic copy (PDF format) of the BART application, including all figures and tables, and all modeling files pertaining to the control technologies evaluated in the BART analysis.

If you have any additional questions regarding this requirement, please feel free to call me at 307-777-7391 or contact Ken Rairigh at 307-777-6188 for further assistance.

Sincerely,



Dave Finley, Administrator
Air Quality Division

cc: Glenn Spangler
Robert Gill

Ken Rairigh
Tina Anderson

Chad Schlichtemeier
Mike Stoll