



United States
Department of
Agriculture

Forest
Service

Rocky
Mountain
Region

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File Code: 2580
Date: April 25, 2005

Gerardo Rios
U.S. EPA Region 9
Air Permit Office (AIR-3)
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Rios:

We are asking for your consideration of concerns raised by Federal Land Managers regarding the Prevention of Significant Deterioration (PSD) air quality permit application originally submitted by STEAG Power, LLC for their proposed Desert Rock generating plant. This PSD application is for a new 1,500 megawatt coal-fired electric generating plant on Navajo Nation land in northwest New Mexico.

We concur with comments submitted by the United States Department of Interior National Park Service (Park Service) regarding the potential impacts this proposed facility may have on air quality related values (AQRVs) in federal mandatory Class I areas and sensitive Class II wilderness areas. We ask that EPA resolve major issues and concerns regarding mitigation of potential impacts before a final decision is made on this permit application. Listed below are some of the major concerns.

1. The initial application was not complete due to the lack of a cumulative impact analysis for effects on visibility and potential impacts associated with atmospheric deposition.
2. The best available control technology (BACT) analysis was incomplete. Technical concerns about BACT were previously raised by the Forest Service Rocky Mountain Region and the Park Service at a meeting regarding this PSD application.
3. The applicant's preliminary analysis following interagency (FLAG) guidelines predicted impacts that trigger a level of concern for potential visibility impairment in Class I areas. We support the additional modeling analysis suggested by the Park Service including the use of adequate wind field data and analysis of plume formation under stable conditions.
5. The emissions inventory was not complete since area and volume sources were not included.



Thank you again for the continuing consultation on this application. Please contact Bud Rolofson, Air Program Branch Chief at (303)-275-5752 regarding any questions about this correspondence.

Sincerely,

/s/ Mark A. Boche
MARK A. BOCHE
Director, State & Private
Forestry

cc: Deborah A Potter, Forest Supervisor Santa Fe National Forest, Bud Rolofson