

BEFORE THE ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.

In the matter of:)

Tucson Electric Power)
Irvington/H. Wilson Sundt Generating)
Station)

PSD Permit No. 1052)
_____)

Appeal No. PSD 18-02

CERTIFIED AND CORRECTED INDEX TO THE ADMINISTRATIVE RECORD

I, Michael LeBlanc, Deputy County Attorney for Pima County, certify that the attached index lists the documents constituting the administrative record required by 40 C.F.R. § 124.18 for Pima County's final Prevention of Significant Deterioration permit issued to Tucson Electric Power for the Irvington Road Generating Station which is the subject of the petition for review in this matter.

Dated October 25, 2018



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Note: Copies of all documents in the Administrative Record are available on the Pima County Department of Environmental Quality (PDEQ) webpage here:
<http://webcms.pima.gov/cms/One.aspx?portalId=169&pageId=363558>

Corrections to the Administrative Record Index filed on September 25, 2018 are in bold and underlined.

A. Permit Applications and Supplemental Application Materials:

Index Number	Document Date	Document Description
1	06/23/2017	Dispersion Modeling Protocol
2	08/01/2017	Application – Initial Tucson Electric Power PSD Submittal
3	08/01/2017	Application – Appendix B - Emission Calculations
4	08/01/2017	Application – Appendix C – Impact Analysis
5	08/11/2017	Application – Endangered Species Act Analysis
<u>5.1</u>	<u>08/23/2017</u>	<u>Administrative Completeness Checklist</u>
<u>5.2</u>	<u>08/28/2017</u>	<u>Cultural Resources Inventory and Historic Building Assessment</u>
6	09/21/2017	Vendor Emission Specifications
<u>6.1</u>	<u>09/27/2017</u>	<u>TEP IGS Modeling Addendum</u>
7	09/28/2017	SCR System Specification
<u>7.1</u>	<u>9/29/2017</u>	<u>TEP IGS Modeling Addendum (with supplement)</u>
8	10/08/2017	SCR Operation Manual
<u>8.1</u>	<u>10/09/2017</u>	<u>Stack Profile for Model</u>
<u>8.2</u>	<u>10/19/2017</u>	<u>Selective Catalytic Reduction Injection Specification</u>
9	12/19/2017	Application – Revised
10	12/22/2017	Modeling Protocol
11	12/22/2017	Modeling Report
12	02/05/2018	NOx Process Monitor Information (<u>Operating Manual for NOx Control Device</u>)
<u>12.1</u>	<u>02/09/2018</u>	<u>Proposed Permit</u>
<u>12.2</u>	<u>02/09/2018</u>	<u>Proposed TSD</u>
13	02/23/2018	TEP Voluntary Proposed NOx Limit
14 <u>13.1</u>	09/07/2018	Compliance Assurance Monitoring Plan for Carbon Dioxide

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B. Guidance, Background Information, and Technical Analysis

Index Number	Document Date	Document Description
<u>13.2</u>	<u>08/31/2017</u>	<u>Pima County Office of Sustainability and Conservation Assessment Response</u>
<u>13.3</u>	<u>09/12/2017</u>	<u>Cultural Resources Assessment</u>
<u>13.4</u>	<u>02/08/2018</u>	<u>NPS Review and Response to Visibility Model and Permit</u>
14	02/09/2018	Environmental Justice Analysis
15	07/02/2018	Estimated Flue Gas Emission Rates & Expected Emissions During Start-Up Rev 1
16	07/05/2018	Estimated Flue Gas Emission Rates & Expected Emissions During Start-Up Rev 2

C. Correspondence:

Index Number	Document Date	Document Description
<u>16.1</u>	<u>09/01/2017</u>	<u>Conditional Approval of Modeling Protocol</u>
<u>16.2</u>	<u>09/08/2017</u>	<u>Technical Review Letter Final to TEP</u>
17	09/17/2017	City of Tucson Historic Preservation Program
18	09/18/2017	US Department of the Interior – Fish and Wildlife Service
<u>18.1</u>	<u>09/19/2017</u>	<u>TEP Response to PDEQ Tech Review</u>
<u>18.2</u>	<u>09/26/2017</u>	<u>Technical Review Letter #2</u>
<u>18.3</u>	<u>09/29/2017</u>	<u>TEP Response to Technical Review Letter #2 (with attachments)</u>
<u>18.4</u>	<u>10/09/2017</u>	<u>Technical Review Letter #3</u>
<u>18.5</u>	<u>10/09/2017</u>	<u>TEP Response to Technical Review Letter #3</u>
<u>18.6</u>	<u>10/12/2017</u>	<u>NPS Response to Modeling Protocol</u>
19	10/19/2017	USEPA Approval of Modeling Procedures

D. Comments and Responses:

Index Number	Document Date	Document Description
20	02/01/2018	Public Comment Period – Open House and Initial Public Hearing
21	02/26/2018	Extended Comment Period and Additional Public Hearing

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<u>21.1</u>	<u>03/07/2018</u>	<u>Response to Comments Timeline Clarification</u>
<u>21.2</u>	<u>03/29/2018</u>	<u>Sierra Club TEP RICE Comments (with exhibits)</u>
22	08/08/2018	PDEQ Responses to Public Comments <u>Appendix A: Summary of Public Notification Process</u> <u>Appendix B: Public Hearing #1 Documents (includes transcript of the March 1, 2018 public hearing)</u> <u>Appendix C: Public Hearing #2 Documents (includes transcript of the March 28, 2018 public hearing)</u> <u>Appendix D: Public Comments Received Documents</u>
<u>22.1</u>	<u>08/08/2018</u>	<u>Permit Issuance Decision Letter</u>

E. Final Issued TEP IGS Permit and TSD:

Index Number	Document Date	Document Description
23	08/08/2018	TEP PSD Air Quality Permit
24	08/08/2018	Technical Support Document

F. Administrative Records in Other Cases:

Index Number	Document Date	Document Description
25	5/2/2001	Order Partially Granting and Partially Denying Petition for Objection to Permit <i>In the Matter of Orange Recycling and Ethanol Production Facility, Pencor-Masada Oxynol, LLC</i>
26	5/28/2009	Order Granting in Part and Denying in Part Petition for Objection to Permit <i>In the Matter of: Citgo Refining and Chemicals Company, L.P. West Plant Corpus Christi, Texas</i>
27	6/22/2012	Order Granting in Part and Denying in Part Petition for Objection to Permit <i>In the Matter of Cash Creek Generation, LLC</i>
28	8/2/2013	Order Remanding in Part and Denying Review in Part <i>In re: Pio Pico Energy Center</i>
29	2/7/2014	Order Granting in Part and Denying in Part Petition for Objection to Permit <i>In the Matter of: Hu Honua Bioenergy Facility Pepeeko, Hawaii</i>

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30	4/2/2018	Order Denying a Petition for Objection to Permit <i>In the Matter of Yuhuang Chemical Inc. Methanol Plant St.</i> <i>James Parish, Louisiana</i>
31		California Power Holdings, LLC Tehama County Air Pollution Control District Permit to Operate number pto220