

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

In re:

Deseret Power Electric Cooperative

PSD Appeal No. 07-03

RECEIVED
U.S. E.P.A.
2007 NOV -2 PM 4:16
ENVIR. APPEALS BOARD

**NOTICE OF FILING OF THE
CERTIFIED INDEX OF THE ADMINISTRATIVE RECORD**

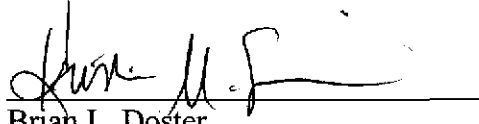
Region VIII of the Environmental Protection Agency (EPA) hereby files the Certified Index to the Administrative Record (Certified Index) for the permitting decision for the Prevention of Significant Deterioration Permit (PSD Permit No. PSD-OU-0002-04.00) issued to Deseret Power Electric Cooperative, which is the subject of this petition for review. The Certified Index consists of the Affidavit of Michael B. (Mike) Owens and Appendix A to PSD Permit No. PSD-OU-0002-04.00, *entitled* List of Documents in the Administrative Record for Issuance of Federal PSD Permit #PSD-OU-0002-04.00 (August 30, 2007). Copies of any of the listed documents may be obtained by contacting Sara L. Laumann of the Office of Regional Counsel at the address and phone number

provided below, or by accessing Region VIII's electronic collection of administrative record documents, *available at* ftp://ftp.epa.gov/r8/deseret/administrative_record/.

Date:

11/2/07

Respectfully submitted,



Brian L. Doster

Kristi M. Smith

Elliott Zenick

Air and Radiation Law Office

Office of General Counsel

Environmental Protection Agency

1200 Pennsylvania Ave. N.W.

Washington, DC 20460

Telephone: (202) 564-7606

Facsimile: (202) 564-5603

Sara L. Laumann

Office of Regional Counsel (R8-ORC)

Environmental Protection Agency, Region 8

1595 Wynkoop St.

Denver, CO 80202-1129

Telephone: (303) 312-6443

Facsimile: (303) 312-6859

STATE OF COLORADO
COUNTY OF DENVER

AFFIDAVIT

I, Michael B. (Mike) Owens, being first duly sworn, depose and state that the following statements set forth in this instrument are true and correct. To such matters, the undersigned certifies that he believes the same to be true:

1. I am employed by the U. S. Environmental Protection Agency (EPA), Region 8 as an Environmental Engineer in the Office of Partnerships and Regulatory Assistance (OPRA), Air & Radiation Program, Air Technical Assistance Unit, located at 1595 Wynkoop Street, Denver, Colorado 80202-1129. I have been employed by the USEPA since August 1976.


2. As an Environmental Engineer for the Air and Radiation Program, my primary job responsibility is to oversee State air permitting programs and secondarily to write Federal air permits in Indian Country. In this regard, I am familiar with the various air emission units and pollution control technologies associated with the operation of coal-fired power plants. I am also familiar with the applicable environmental regulatory and permitting requirements for utility projects, including, but not limited to, the Prevention of Significant Deterioration (PSD) program. Among other things, I work closely with and at the direction of my supervisor, Melanie Pallman, Leader of the Air Technical Assistance Unit, to prepare draft and final versions of construction and operating permits. I am also involved in directing communications with permit applicants and interested persons in the permitting process, and researching, as necessary, available records and documents related to my review of permit applications and other associated work tasks.

3. As part of my responsibilities, I was assigned to review the Permit Application No. PSD-OU-0002-04.00, received from Deseret Power Electric Cooperative. Deseret proposed construction of a 110-Megawatt Waste Coal Fired Unit at Bonanza Power Plant, near the town of Bonanza, Utah, approximately 35 miles southeast of Vernal, UT. The application was received by US EPA Region 8 on April 13, 2004.

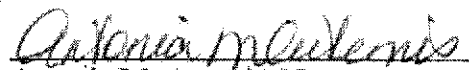
4. Since being assigned this application, I have maintained responsibility of the application file and have overseen management of all documents, as they were acquired, that related to the permit application. These documents include written correspondence and other documents needed to evaluate the permit application, as well as other related materials assembled by myself and other US EPA Region 8 personnel during the course of permit review.

5. Based on my review of the application file for the Deseret Power Electric Cooperative PSD permit, I have identified individual documents, including attachments thereto, and miscellaneous materials that were directly or indirectly relied upon by the US EPA Region 8 in review of the permit application and the resulting permit issuance. I am thus able to certify that those documents are identified in the Administrative Record that has been prepared for the pending appeal before the Environmental Appeals Board.

Further affiant sayeth not.


Michael B. (Mike) Owens

Subscribed and sworn
To Before Me this 2nd Day of November, 2007


Antonia M. Artemis, Notary
State of Colorado
County of Denver
My commission expires February 5, 2010.



Appendix A
List of Documents in the Administrative Record
for Issuance of Federal PSD Permit #PSD-OU-0002-04.00
August 30, 2007

<u>Date</u>	<u>Description</u>
05-23-86	Letter from J. Craig Potter, Assistant Administrator for Air & Radiation, US EPA, to Nancy Maloley, Commissioner, Indiana Department of Environmental Protection, on short-term emission limits for SO ₂ SIPs. (6 pages)
09-22-87	Memorandum from Gerald A. Emission, Director, Office of Air Quality Planning and Standards, US EPA, to various EPA Directors, regarding Implementation of North County Resource Recovery PSD Remand. (6 pages)
08-14-01	Cover letter submitted with initial modeling protocol cover letter from Deseret Power to EPA. Entire modeling protocol was later revised and resubmitted to EPA on 12-04-01, then revised and resubmitted again on 03-09-04. The final 03-09-04 revised protocol is included in this administrative record. (2 pages)
10-01-01	Letter and enclosure from EPA to Deseret Power, commenting on 08-14-01 modeling protocol. (3 pages)
10-16-01	EPA meeting record for initial meeting with Deseret Power. (1 page)
12-04-01	Revised cover letter for modeling protocol submitted by Deseret Power to EPA. Replaces 08-14-01 version. Entire final modeling protocol was later revised and resubmitted to EPA on 03-09-04. Final protocol included in the administrative record. (1 page)
03-09-04	Revised modeling protocol with cover letter submitted from Deseret Power to EPA. Replaces the 08-14-01 and 12-04-01 versions. (2 electronic documents, 171 total pages)
03-17-04	E-mail from EPA to Deseret Power regarding request from U.S. Forest Service. (1 page)
04-12-04	EPA comments to Deseret Power on 03-09-04 modeling protocol. (2 pages)
04-13-04	Original cover letter for PSD permit application submitted by Deseret Power to EPA. Entire application was later revised and resubmitted to EPA on 11-01-04. The final 11-01-04 revised application is included in this administrative record. (1 page)

Appendix A - Federal PSD Permit #PSD-OU-0002-04.00 (August 30, 2007)

- 04-27-04 E-mail and attachment regarding meeting between EPA and Deseret Power. (2 pages)
- 04-28-04 EPA meeting record, meeting between EPA and Deseret Power. (2 pages)
- 05-03-04 E-mail from Deseret Power to EPA on projected water usage. (1 page)
- 05-17-04 Letter from Deseret Power to EPA, on modeling protocol. (5 pages)
- 05-20-04 Public comment letter by a group of environmental organizations on Utah's draft PSD permit for construction of Intermountain Power, Unit #3 (IPP3). (57 pages)
- 06-09-04 Letter from Deseret Power to EPA on various permit issues. (8 pages)
- 07-29-04 Letter from Deseret Power to EPA on revised visibility modeling. (2 pages)
- 08-06-04 E-mail from National Park Service to Deseret Power on revised visibility modeling. (1 page)
- 10-15-04 State of Utah Approval Order for PSD Major Permit Modification to Add New Unit 3 at Intermountain Power Generating Station, Millard County, Utah. (16 pages)
- 11-01-04 Revised PSD permit application (Volumes 1 and 2) with cover letter submitted by Deseret Power to EPA. Replaces the entire original 04-13-04 permit application. (3 electronic documents: cover letter, 2 pages; Volume 1, 230 pages, Volume 2, 683 pages)
- 11-18-04 E-mail and attachment from EPA to Deseret Power on draft meeting agenda for November 23, 2004 meeting. (2 pages)
- 11-22-04 Letter and two enclosures from EPA to Deseret Power. (7 pages)
- 11-26-04 E-mail from EPA to Deseret Power on condensibles. (1 page)
- 11-29-04 E-mail and two attachments from EPA to Deseret Power on general provisions of 40 CFR part 63. (112 pages)
- 12-02-04 E-mail and attachment from National Park Service to EPA on CFB boilers. (2 pages)
- 12-10-04 E-mail from U.S. Forest Service to Deseret Power and EPA, on review of modeling for impacts on Class I areas. (2 pages)

Appendix A - Federal PSD Permit #PSD-OU-0002-04.00 (August 30, 2007)

- 12-10-04 E-mail from EPA to Deseret Power on action items. (3 pages)
- 12-29-04 Letter from EPA to Deseret Power on additional information needed. (7 pages)
- 03-23-05 Letter from Deseret Power to EPA on permit modeling. (17 pages)
- 03-23-05 Letter from Deseret Power to EPA on U.S. Forest Service modeling comments. (22 pages)
- 04-06-05 E-mail from EPA to Deseret Power regarding PSD permit application. (1 page)
- 04-06-05 Approval Order (final NSR permit), issued by the State of Utah to PacifiCorp, for Installation of a Wet-Lime FGD, Baghouse and Low-NOx Combustion Controls at Huntington Power Plant, Unit 2. (12 pages)
- 04-13-05 E-mail from EPA to Deseret regarding application. (3 pages)
- 05-04-05 E-mail and attachment from Deseret Power to EPA, regarding SO₂ emission limit with scrubber. (6 pages)
- 05-10-05 Letter and enclosure from Deseret Power to EPA, permit application issues. (25 pages)
- 05-25-05 E-mail from EPA to Deseret Power, SO₂ emission limit. (7 pages)
- 05-26-05 E-mail and four attachments from National Park Service to EPA, regarding BACT. (54 pages)
- 06-13-05 Letter from EPA to Deseret Power, regarding MACT. (2 pages)
- 06-16-05 E-mail from National Park Service to EPA, regarding modeling. (1 page)
- 06-16-05 E-mail and two attachments from National Park Service to EPA, discussing SO₂ and NOx BACT. (5 pages)
- 06-16-05 E-mail from Deseret Power to EPA on coal sampling. (2 pages)
- 06-22-05 Letter and two enclosures from EPA to Deseret Power on various permit issues. (12 pages)
- 06-27-05 E-mail and attachment from National Park Service to EPA on low-temperature SCR for NOx BACT. (3 pages)

Appendix A - Federal PSD Permit #PSD-OU-0002-04.00 (August 30, 2007)

- 07-08-05 Letter from EPA to Deseret Power on NOx BACT. (4 pages)
- 07-21-05 Letter and two enclosures from EPA to U.S. Fish & Wildlife Service, regarding Endangered Species Act section 7 consultation. (27 pages)
- 07-25-05 Letter from EPA to Deseret Power on SO₂ BACT. (3 pages)
- Aug. 2005 Excerpt (page 4-16) from PSD permit application for proposed South Heart CFB boiler project in North Dakota. (2 pages)
- 08-22-05 E-mail from National Park Service to EPA, regarding modeling. (1 page)
- Sept. 2005 Federal Land Manager Criteria Document, 2nd Draft (Calpuff Reviewers Guide). (29 pages)
- 09-13-05 Letter and five attachments from Deseret Power to EPA, responding to EPA letters. (29 pages)
- 09-15-05 Letter from Deseret Power to EPA, providing further response to EPA letter of 07-08-05. (4 pages)
- 09-26-05 E-mail from Deseret Power to EPA on core sample data. (2 pages)
- 09-28-05 E-mail and two attachments from National Park Service to EPA, providing information on other CFB boiler projects (River Hill, Greene, Robinson). (59 pages)
- 09-28-05 E-mail and two attachments from National Park Service to EPA, providing a copy of a technical article by a consulting firm (Alstom) relating to fuel-bound nitrogen. (8 pages)
- 10-06-05 E-mail from EPA to Deseret Power on NOx BACT. (1 page)
- 10-06-05 E-mail inquiry from Deseret Power to EPA, and EPA's response, PSD permit modifications. (2 pages)
- 10-06-05 E-mail from EPA Region 7 to EPA Region 8 on SO₂ BACT. (3 pages)
- 10-12-05 E-mail from EPA to National Park Service. (2 pages)
- 10-12-05 E-mail and attachment from Deseret Power to EPA regarding break-in period. (2 pages)

Appendix A - Federal PSD Permit #PSD-OU-0002-04.00 (August 30, 2007)

- 10-12-05 E-mail from EPA to Deseret Power on various WCFU topics. (2 pages)
- 10-13-05 E-mail from EPA to Deseret Power on the BACT determination for the emergency generator. (3 pages)
- 10-13-05 E-mail and four attachments from Deseret Power to EPA on NOx generation. (6 pages)
- 10-14-05 E-mail and six attachments from Deseret Power to EPA, regarding BACT for the emergency generator. (7 pages)
- 10-17-05 E-mail and three attachments from Deseret Power to EPA, regarding BACT for the emergency generator. (5 pages)
- 10-27-05 E-mail and attachment from Deseret Power to EPA, attaching a list of documents that Deseret Power considers as amendments to its 11-01-04 PSD permit application. (2 pages)
- 11-02-05 E-mail and two attachments from EPA to Deseret Power regarding SO₂ BACT. (1 pages)
- 11-02-05 E-mail and two attachments from EPA to Deseret Power, documents that constitute amendments to Deseret Power's PSD permit application of 11-01-04. (6 pages)
- 11-03-05 E-mail and attachment from Deseret Power to EPA, PSD permit application amendment list. (2 pages)
- 11-03-05 E-mail from Deseret Power to EPA, PSD permit application amendments. (1 page)
- 11-03-05 E-mail from Deseret Power to EPA, regarding washed coal. (2 pages)
- 11-03-05 E-mail and two attachments from EPA to Deseret Power, transmitting the Gascoyne and South Heart write-ups on SO₂ BACT. (38 pages)
- 11-04-05 E-mail from Deseret Power to EPA on modeling limits. (4 pages)
- 11-09-05 E-mail and attachment from Deseret Power to EPA on SO₂ removal versus NOx generation. (11 pages)

Appendix A - Federal PSD Permit #PSD-OU-0002-04.00 (August 30, 2007)

- 11-09-05 E-mail and three attachments from Deseret Power to EPA on wet scrubber BACT. (13 pages)
- 11-09-05 E-mail and six attachments (the cover email indicates there are seven attachments, however, one attachment is a duplicate) from EPA to Deseret Power on BACT. (92 pages)
- 11-11-05 E-mail from Deseret Power to EPA on cooling tower BACT. (1 page)
- 11-15-05 E-mail from EPA to Deseret Power, regarding diluent cap approach. (1 page)
- 11-16-05 E-mail from EPA to Deseret Power on waste stockpile projections. (1 page)
- 11-17-05 E-mail from Deseret Power to EPA on waste stockpile projections. (2 pages)
- 11-22-05 E-mail from National Park Service to EPA on modeling limits. (8 pages)
- 11-22-05 E-mail and attachment from National Park Service to EPA on BACT for CFB boiler in New Mexico permit. (6 pages)
- 11-23-05 E-mail and two attachments from Deseret Power to EPA on material handling system BACT. (4 pages)
- 11-23-05 E-mail from EPA to Deseret Power, 3-hr and 24-hr emission estimates. (1 page)
- 11-23-05 E-mail (and two letter attachments) from Deseret Power to EPA on Method 202. (25 pages)
- 11-28-05 E-mail and attachment from Deseret Power to EPA on Method 202. (12 pages)
- 11-28-05 E-mail from Deseret Power to EPA on 3-hr and 24-hr emission limits for NO_x and PM₁₀. (2 pages)
- 11-29-05 E-mail from EPA to Deseret Power regarding 3-hr and 24-hr emission estimates. (2 pages)
- 11-29-05 Fax from North Dakota Department of Health to EPA, copy of BACT determinations for materials handling baghouses. (5 pages)
- 11-30-05 E-mail and attachment from EPA to Deseret Power on Method 202 issues. (11 pages)
- 12-01-05 E-mail and two attachments from EPA to Deseret Power transmits a pre-draft

Appendix A - Federal PSD Permit #PSD-OU-0002-04.00 (August 30, 2007)

- of the PSD permit and Statement of Basis. (129 pages)
- 12-13-05 E-mail from Deseret Power to EPA, on 3-hr and 24-hr emission estimates. (1 page)
- 12-13-05 E-mail and attachment from Deseret Power to EPA, on drift loss PM10 BACT analysis (2 pages).
- 12-14-05 EPA meeting record from conference call with Deseret Power on SO₂ BACT. (2 pages)
- 12-14-05 E-mail from EPA to Deseret Power on cooling tower BACT. (2 pages)
- 12-14-05 E-mail from Deseret Power to EPA on cooling tower BACT. (3 pages)
- 12-20-05 E-mail from Deseret Power to EPA on status of Estill County Energy Partners Project. (1 page)
- 12-21-05 E-mail and attachment from Deseret Power to EPA, commenting on the 12-01-05 pre-draft permit. (8 pages)
- 12-22-05 E-mail and two attachments from Deseret Power to EPA, regarding Statement of Basis. (10 pages)
- 12-22-05 Letter from EPA to Deseret Power, regarding testing by boiler supplier. (2 pages)
- 12-27-05 E-mail from Deseret Power to EPA, comments on Statement of Basis. (1 page)
- 12-27-05 E-mail from EPA to Deseret Power, responding to Deseret Power's e-mail of the same day. (2 pages)
- 01-06-06 E-mail and attachments from EPA to Deseret Power on SO₂ BACT, as follow-up to a conference call. (24 pages)
- 01-09-06 E-mail and Excel spreadsheets from Deseret Power to EPA, on emission limits for SO₂ BACT. (4 pages)
- 01-13-06 E-mail from Deseret Power to EPA, description of waste coal characteristics. (3 pages)
- 01-13-06 E-mail and attachment from Deseret Power to EPA, regarding SO₂ BACT proposal. (2 pages)

Appendix A - Federal PSD Permit #PSD-OU-0002-04.00 (August 30, 2007)

- 01-18-06 E-mail and attachment from Deseret Power to EPA, regarding two-tier emission limit approach for SO₂ BACT. (4 pages)
- 01-30-06 E-mail from Deseret Power to EPA regarding condensable particulate. (1 page)
- 02-02-06 E-mail from Deseret Power to EPA, regarding boiler design and operation. (1 page)
- 02-03-06 E-mail from EPA to Deseret Power regarding condensible particulate emissions. (2 pages)
- 02-06-06 E-mail from EPA to Deseret Power regarding Method 8 versus CCM. (2 pages)
- 02-07-06 E-mail from Deseret Power to EPA, CO BACT limit. (1 page)
- 02-08-06 E-mail from Deseret Power to EPA, CO BACT limit. (1 page)
- 02-10-06 E-mail and attachments from EPA to Deseret Power regarding condensible particulate. (103 pages)
- 02-10-06 E-mail and two attachments from EPA to Deseret Power transmits a new pre-draft of the PSD permit and Statement of Basis. (169 pages)
- 02-15-06 E-mail and attachment from EPA to Deseret Power transmits a revision to the pre-draft Statement of Basis, to reflect the revised NSPS Subpart Da. (5 pages)
- 02-15-06 E-mail and eight attachments from Deseret Power to EPA and U.S. Fish & Wildlife Service regarding Endangered Species Act section 7 consultation. (23 pages)
- 02-16-06 EPA letter and enclosures to Ute Indian Tribe. (20 pages)
- 02-21-06 E-mail from Deseret Power to EPA on PSD BACT emission limit for sulfuric acid (H₂SO₄). (3 pages)
- 02-22-06 E-mail and two attachments from EPA to Deseret Power regarding Statement of Basis. (7 pages)
- 02-22-06 E-mail from Deseret Power to EPA regarding condensible particulate emissions. (3 pages)
- 02-23-06 E-mail from Deseret Power to EPA, regarding condensible particulate. (6 pages)

Appendix A - Federal PSD Permit #PSD-OU-0002-04.00 (August 30, 2007)

- 02-24-06 E-mail and three attachments from Deseret Power to EPA regarding condensible particulate matter. (40 pages)
- 02-24-06 E-mail and two attachments from Deseret Power to EPA submits comments on the 02-10-06 pre-draft permit package. (6 pages)
- 03-09-06 E-mail and two attachments from EPA to Deseret Power regarding condensible particulate matter. (9 pages)
- 03-21-06 E-mail from EPA to National Park Service transmits a copy of the pre-draft permit and Statement of Basis for review. (1 page)
- 03-22-06 E-mail from EPA to USDA Forest Service transmits a copy of the pre-draft permit and Statement of Basis for review. (1 page)
- 03-23-06 E-mail from EPA to Vernal Field Office of the Bureau of Land Management transmits a copy of the pre-draft permit and Statement of Basis for review. (1 page)
- 03-27-06 E-mail from Deseret Power to EPA, regarding condensible particulate matter. (5 pages)
- 04-03-06 E-mail and two attachments from EPA Region 4 to EPA Region 8 transmits a copy of March 31, 2006 comments by East Kentucky Power Cooperative on the draft PSD/Title V permit for the Spurlock facility in Kentucky. (18 pages)
- 04-05-06 Fax from EPA Region 3 to EPA Region 8 transmits a copy of results of stack tests at the Reliant Energy Seward facility in Pennsylvania. (19 pages)
- 04-07-06 E-mail from EPA to Deseret Power regarding requested operational flexibility. (1 page)
- 04-10-06 E-mail from Deseret Power to EPA regarding operational flexibility. (2 pages)
- 04-11-06 E-mail and two attachments from Deseret Power to EPA regarding Endangered Species Act section 7 consultation. (10 pages)
- 04-12-06 Fax from EPA Region 3 to EPA Region 8 transmits a copy of results of stack tests conducted in April of 2004 at the AES facility in Puerto Rico for filterable and condensible particulate matter. (4 pages)
- 04-13-06 E-mail and attachment from EPA to Deseret Power, BACT emission limit for condensible particulate matter. (4 pages)

Appendix A - Federal PSD Permit #PSD-OU-0002-04.00 (August 30, 2007)

- 04-14-06 E-mail and attachment from Deseret Power to EPA, regarding CFB boiler projects: ADM in Illinois; and AES in Puerto Rico. (3 pages)
- 04-18-06 E-mail from Deseret Power to EPA regarding AES in Puerto Rico coal quality. (1 page)
- 04-20-06 E-mail from USDA Forest Service to EPA provides comments on the pre-draft permit package. (3 pages)
- 04-25-06 E-mail and attachment from Deseret Power to EPA, regarding particulate emissions. (2 pages)
- 05-02-06 E-mail and two attachments from EPA to Deseret Power with excerpts from redraft SOB. (22 pages)
- 05-05-06 E-mail from Deseret Power to EPA regarding SOB redraft. (2 pages)
- 05-05-06 E-mail from Deseret Power to EPA, regarding baghouse inlet particulate. (1 page)
- 05-12-06 E-mail and three attachments from EPA responding to National Park Service comments. (28 pages)
- 05-19-06 E-mail and two attachments from EPA to Deseret Power transmits a new pre-draft of the permit and Statement of Basis. (198 pages)
- 05-24-06 E-mail from Deseret Power to EPA requests a public hearing be held for the draft PSD permit (request withdrawn on 05-26-06). (1 page)
- 05-26-06 E-mail and attachment from Deseret Power to EPA submits comments pre-draft PSD permit. (5 pages)
- 05-26-06 E-mail from Deseret Power to EPA submits comments on the pre-draft Statement of Basis and withdraws public hearing request. (3 pages).
- 05-30-06 E-mail from EPA to Deseret Power, regarding NO_x and SO₂. (1 page)
- 05-31-06 E-mail from EPA to Deseret Power, regarding BACT limits (2 pages)
- 05-31-06 E-mail and attachment from EPA to Deseret Power transmits a copy of EPA's draft public notice. (3 pages)

Appendix A - Federal PSD Permit #PSD-OU-0002-04.00 (August 30, 2007)

- 06-06-06 E-mail and three attachments from EPA to Deseret Power: a copy of the latest draft of the PSD permit and Statement of Basis, dated 06-06-06, along with a public service announcement. (203 pages)
- 06-14-06 Draft Federal PSD permit #PSD-OU-0002-04.00 prepared for public comment. (38 pages)
- 06-14-06 Draft Statement-of-Basis for Federal PSD permit #PSD-OU-0002-04.00 prepared for public comment. (165 pages)
- 06-14-07 Final Public Notice. (2 pages)
- Starting
06-27-06 EPA public notices (5 electronic documents) that were published in the following five newspapers, announcing opportunity for comment on the draft WCFU permit and Statement-of-Basis, June 27, 2006 through July 29, 2006: (1) Uintah Basin Standard (Roosevelt, UT), June 27, 2006, (2 pages); Vernal Express (Vernal, UT), June 28, 2006, (2 pages); The Daily Sentinel (Grand Junction, CO), June 28, 2006, (1 page); Rio Blanco Herald Times (Meeker/ Rangely, CO), June 29, 2006, (1 page); and Salt Lake Tribune (Salt Lake City, UT), June 29, 2006, (2 pages)
- 07-05-06 Final Public Service Announcement (and associated Email) prepared by EPA announcing the availability of draft Federal PSD permit package for public comment. (2 pages)
- 07-14-06 Letter from National Park Service to EPA. (1 page)
- 07-25-06 Letter from EPA to U.S. Fish & Wildlife Service transmits EPA's Biological Evaluation for the WCFU project, as part of EPA's consultation with USFWS under section 7 of the Endangered Species Act. (21 pages)
- 07-26-06 E-mail from Kathy Van Dame, Wasatch Clean Air Coalition, submits comments on the draft WCFU permit package. (2 pages)
- Starting
07-26-06 Letters from seven Mayors submitting comments on the proposed permit (all one electronic document, 10 total pages): (1) J. Lane Henderson, Mayor of Salem City, Utah (2 pages); (2) Letter from Joe L. Thomas, Mayor of Spanish Fork, Utah (1 page); (3) Letter from Lewis K. Billings, Mayor of Provo, Utah (2 pages); (4) Letter from Natasha R. Madsen, Mayor of Manti City, Utah (1 page); (5) Letter from Gary Esplin, Mayor of St. George City, Utah (2 pages); (6) Letter from Robert B. Shepherd, Mayor of Town of Levan, Utah, (1 page); and (7) Letter from Mark R. Jones, Mayor of Nephi City, Utah, (1 page).

Appendix A - Federal PSD Permit #PSD-OU-0002-04.00 (August 30, 2007)

- 07-28-06 Letter and 22 attachments from a consortium of environmental organizations to EPA submits comments on the draft WCFU permit package, arranged into 11 major categories of comments. The environmental organizations are: Western Resource Advocates, Environmental Defense, Utah Chapter of the Sierra Club, Southern Utah Wilderness Alliance, Western Colorado Congress, Wasatch Clean Air Coalition, and HEAL Utah. (Letter 29 pages. Attachments included and labeled in electronic record as separate documents with page counts as follows: Attachment (A) #1, 124 pages; A #2, 67 pages; A #3, 6 pages; A #4, 8 pages; A #5, 4 pages; A #6, 12 pages; A #7, 4 pages; A #8, 4 pages; A #9, 43 pages; A #10, 13 pages; A #11, 76 pages; A #12, 8 pages; A #13a, 1 page; A #13b, 29 pages; A #14, 15 pages; A #15, 45 pages; A #16, 25 pages; A #17, 11 pages; A #18, 27 pages; A #19, 9 pages; A #20a, 2 pages; A #20b, 9 pages; A #21a, 4 pages; A #21b, 14 pages; and A #22, 2 pages.)
- 10-13-06 Letter from EPA to Deseret Power regarding permit issuance timing. (1 pages)
- 10-16-06 EPA meeting record from meeting on this date in Denver, Colorado, with Deseret Power. (7 pages)
- 10-24-06 E-mail from EPA to Deseret Power requests information on supercritical CFB boilers and NOx control options. (2 pages)
- 11-06-06 E-mail and seven attachments from Deseret Power to EPA, information on supercritical CFB boilers and NOx control options. (176 pages)
- 11-06-06 E-mail from EPA to Deseret Power requests additional information. (1 page)
- 11-08-06 E-mail from EPA to Deseret Power regarding ambient air quality monitoring. (2 pages)
- 11-08-06 E-mail from EPA to Deseret Power requests additional information. (3 pages)
- 11-09-06 E-mail from Deseret Power to EPA regarding ambient air quality monitoring. (2 pages)
- 11-09-06 E-mail and attachment from Deseret Power copy of pages from the Coal Quality Handbook for IGCC. (12 pages)
- 11-13-06 E-mail from Deseret Power to EPA providing clarifications. (5 pages)
- 11-13-06 E-mail from Deseret Power to EPA providing clarifications regarding supercritical CFB boilers and to NOx controls. (5 pages)

Appendix A - Federal PSD Permit #PSD-OU-0002-04.00 (August 30, 2007)

- 11-14-06 E-mail from Deseret Power to EPA regarding supercritical CFB boilers. (1 page)
- 11-14-06 E-mail from EPA to Deseret Power regarding clean coals. (1 page)
- 11-15-06 E-mail and four attachments from Deseret Power to EPA regarding clean coals. (16 pages)
- 11-27-06 E-mail from EPA to Deseret Power regarding carbon injection for NOx control. (5 pages)
- 12-04-06 E-mail from Deseret Power to EPA and to U.S. Fish & Wildlife Service regarding Endangered Species Act section 7 consultation. (2 pages)
- 12-05-06 E-mail from Deseret Power to EPA regarding carbon injection for NOx control. (7 pages)
- 12-08-06 E-mail from Deseret Power to EPA and to U.S. Fish & Wildlife Service regarding Endangered Species Act section 7 consultation. (1 page)
- 01-17-07 Letter from Deseret Power to EPA regarding concerns. (1 page)
- 02-16-07 Letter from EPA to Deseret Power responds to Deseret's 01-17-07 letter. (2 pages)
- 03-05-07 Intent-to-Approve (draft NSR permit) issued by the State of Utah to PacifiCorp, for Installation of Pollution Control Equipment, Establishing Plant-Wide Applicability Limitations and Approval Orders Consolidation, at Hunter Power Plant. (16 pages)
- 04-02-07 Letter from Deseret Power to EPA requesting a meeting. (1 page)
- 04-05-07 E-mail from Deseret Power to EPA regarding permit application. (1 page)
- 04-05-07 E-mail from Deseret Power to EPA regarding permit application. (2 pages)
- 04-16-07 Letter from U.S. Fish & Wildlife Service to EPA transmits the USFWS's final Biological Opinion under the Endangered Species Act, section 7 consultation, on the proposed WCFU project. (49 pages)
- 04-24-07 E-mail from Katy Savage, a citizen in Provo, Utah, to EPA expresses concerns. (1 page)

Appendix A - Federal PSD Permit #PSD-OU-0002-04.00 (August 30, 2007)

- 04-25-07 Letter from Daniel D. McArthur, Mayor of St. George City, Utah, expresses concern. (2 pages)
- 05-01-07 Letter from EPA to Deseret Power responds to Deseret's meeting request. (1 page)
- 05-07-07 EPA meeting record from meeting on this date at EPA Headquarters with Deseret Power, regarding status of WCFU permit issuance. (2 pages)
- 08-08-07 Memorandum from Mike Owens of EPA Region 8 to the Deseret Bonanza WCFU PSD Permit File. Subject: Deseret WCFU Response #4.c.(1): Communication with Ravi Srivastava of EPA-OAQPS. (1 page)
- 08-09-07 Memorandum and attachments from Mike Owens of EPA Region 8 to the Deseret Bonanza WCFU PSD Permit File. Subject: Deseret WCFU response #4.b.(1): regarding SO₂ CEMS Data from AES Puerto Rico facility in EPA Region 2. (211 pages)
- 08-30-07 EPA response to public comments on draft WCFU permit package. (113 pages)
- 08-30-07 Final Federal PSD permit #PSD-OU-0002-04.00 issued for Deseret's WCFU. (39 pages)
- 08-30-07 Final Statement-of-Basis issued for Federal PSD permit #PSD-OU-0002-04.00. (184 pages)
- Various dates BACT cost excerpts from recent State PSD permit actions for construction of coal-fired boilers:
- GA – Longleaf Energy Associates, Longleaf Energy Station, PC-fired boiler. Preliminary Determination for SIP Permit Application #15846, page 62, Dated July 2006, available online at: <http://www.air.dnr.state.ga.us/airpermit/psd/dockets/longleaf/permitdocs/0990030pd.pdf> (2 pages)
 - MT – Rocky Mountain Power Inc., Hardin Station, PC-fired boiler. Permit Analysis for Hardin project, Air Quality Permit #3185-02, pages 15 and 17, dated May 16, 2005, obtained from Montana Air Resources Management Bureau, in the Montana Department of Environmental Quality. (3 pages)
 - MT – Southern Montana Electric Generation & Transmission Cooperative, Highwood Generating Station, CFB boiler. Permit Analysis for Highwood

Appendix A - Federal PSD Permit #PSD-OU-0002-04.00 (August 30, 2007)

- Project, Air Quality Permit #3423-00, page 23, dated May 30, 2007, obtained from the Montana Department of Environmental Quality Air Resources Management Bureau, Helena, Montana. (2 pages)
- ND – Montana-Dakota Utilities, Gascoyne 175-MW generating station, CFB boiler. Permit Application Analysis for Gascoyne Project, pages 65 and 68, dated March 2005, obtained from the North Dakota Department of Health, Environmental Health Section, Air Quality Division, Bismarck, ND. (3 pages)
 - ND – Red Trail Energy LLC, ethanol production plant, CFB boiler. Permit Application Analysis for Red Trail Energy project, pages 38 and 40, dated May 2004, obtained from the North Dakota Department of Health, Environmental Health Section, Air Quality Division, Bismarck, ND. (3 pages)
 - NE – Archer-Daniels-Midland, Columbus corn milling & ethanol production plant, CFB boiler. Permit action CP06-0008, page 12 of Fact Sheet, dated September 8, 2006, available online at: http://www.epa.gov/region07/programs/artd/air/nsr/archives/2006/finalpermits/cargill_blair_final_psd_permit.pdf (5 pages)
 - NE – Cargill Inc., Blair corn milling plant, CFB boiler. Permit action CPM02-0006, page 14 of Appendix B of Fact Sheet; pages 8, 9, 19 and 20 of Appendix D of Fact Sheet, dated August 4, 2006, available online at: http://www.epa.gov/region07/programs/artd/air/nsr/archives/2006/finalpermits/adm_columbus_final_psd_permit.pdf (2 pages)
 - PA – River Hill Power Company project, CFB boiler. “Plan Approval Application Review Memo, Plan Approval Application #17-00055A,” pages 10-11, dated May 2, 2005, obtained from the Commonwealth of Pennsylvania, Department of Environmental Protection, Northcentral Region, Air Quality Program. (3 pages)
 - PA – Wellington Development, Greene Energy Resource Recovery Project, CFB boiler. Pennsylvania’s “Comment and Response Document,” Air Quality File PA-30-00150A, page 6, dated June 21, 2005; Table 5-4 of PSD Permit Application, prepared by ENSR International, August 2004, page 5-29. Both documents were obtained from the Commonwealth of Pennsylvania, Department of Environmental Protection, Southwest Regional Office, Air Quality Program. (4 pages)
 - UT – Intermountain Power, Unit #3 project, PC-fired boiler. Utah’s

Appendix A - Federal PSD Permit #PSD-OU-0002-04.00 (August 30, 2007)

Modified Source Plan Review for IPP3 project, pages 132-133, dated March 22, 2004, available online at:
<http://www.airquality.utah.gov/Permits/PmtPowerPlants.htm>. (3 pages)

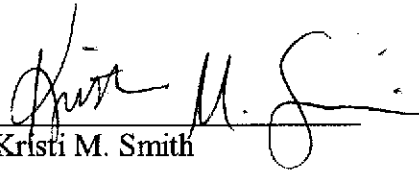
- WY – Basin Electric Power Cooperative, Dry Fork plant, PC-fired boiler. Wyoming's Permit Application Analysis for the Dry Fork project, NSR-AP-3546, pages 6, 7, 8, 10 and 11, dated February 5, 2007, obtained from Wyoming Air Quality Division, Cheyenne, WY. (5 pages)
- WY – Black Hills Power & Light, WYGEN 2, PC-fired boiler. Wyoming's Permit Application Analysis for the WYGEN2 project, NSR-AP-92, page 7, dated April 24, 2002, obtained from Wyoming Air Quality Division, Cheyenne, WY. (3 pages)
- WY – Black Hills Power & Light, WYGEN 3, PC-fired boiler. Wyoming's Permit Application Analysis for the WYGEN3 project, NSR-AP-3934, pages 10 and 11, dated October 9, 2006, obtained from Wyoming Air Quality Division, Cheyenne, WY. (3 pages)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the attached was sent to following in the manner indicated:

David Bookbinder
Sierra Club
400 C Street, NE
Washington, DC 20002
david.bookbinder@sierraclub.org

U.S. Mail and electronic mail



Kristi M. Smith