

**ENVIRONMENTAL APPEALS BOARD  
U.S. ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C.**

<b>In Re:</b>	)	
	)	
	)	
<b>Four Corners Power Plant</b>	)	
<b>NPDES Renewal Permit: NN0000019</b>	)	<b>NPDES Appeal No. 19-06</b>
<b>Arizona Public Service Company (Applicant)</b>	)	
	)	
	)	

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**Motion for Leave to Exceed Word Limitation**

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Petitioners consulted with counsel for EPA prior to filing this Motion. EPA takes no position on the Motion.

Petitioners acknowledge that its Petition is 18,696 words excluding the portions allowed pursuant to 40 C.F.R. § 124.19(d)(3). Petitioners acknowledge that the number of words exceeds the allowable 14,000 word limit. Petitioners’ initial certification of word count was incorrect and Petitioners’ counsel apologizes for this inaccuracy.

Petitioners request that the EAB grant leave to exceed the word limitation. Petitioners have good cause for leave to exceed the word limit due to the extensive number of legal and technical deficiencies in the Final NPDES permit that required significant briefing. In addition, this permit has a long and relevant history that was important to describe in the Petition. The Petition is concise, is not redundant, and does not raise irrelevant issues. Accordingly, Petitioners request that the EAB grant leave to exceed the word limitations and accept the Petition as filed.

11/15/2019

Respectfully submitted,

s/ John Barth  
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ATTORNEY FOR PETITIONERS

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing **Motion for Leave to Exceed Word Limitation** was served, by the method indicated, on the following persons this 15<sup>th</sup> day of November 2019:

By electronic filing and by U.S.P.S. Priority Mail:

Clerk of the Board  
U.S. EPA  
Environmental Appeals Board  
1200 Pennsylvania Avenue, NW  
Mail Code 1103M  
Washington, D.C. 20460-0001

Mike Stoker, Regional Administrator  
U.S. Environmental Protection Agency  
Region 9  
75 Hawthorne Street  
San Francisco, CA 94105-3901  
(By U.S.P.S. Priority Mail)

Neil Brown  
Department Manager  
Environmental Operations  
Arizona Public Service Company  
400 North 5<sup>th</sup> Street, M.S. 9303  
Phoenix, Arizona 85004-3902  
(By U.S.P.S. Priority Mail)

DATE: 11/15/2019

s/ John M. Barth