



MEMORANDUM

Date: August 7, 2018

To: The Honorable Chairman and Members
Pima County Board of Supervisors

From: C.H. Huckelberry
County Administrator 

Re: **Tucson Electric Power Air Quality Permit Related to the Irvington Generating Station Proposal to Install Ten Natural Gas-fired and Reciprocating Internal Combustion Engines**

This proposed action is part of Tucson Electric Power (TEP) upgrades to their generating capability and the ability to match rapid declines in renewable energy produced through solar with rapid recovery of generating capacity to meet system customer demands.

The Pima Department of Environmental Quality (PDEQ) has undertaken an extensive public review, comment and technical analysis associated with this proposal and plans to issue the prevention of significant deterioration in air quality permit to the Irvington Generating Station on or about August 8, 2018. Once issued, there is a 30-day period when anyone who submitted a comment during the official comment period, may appeal the permit decision by the County to the Environmental Protection Agency (EPA) Environmental Appeals Board.

If you have any comments and/or questions regarding the issuance of this permit, please feel free to contact myself, Deputy County Administrator Carmine DeBonis or Pima Department of Environmental Quality Director Ursula Nelson.

CHH/lab

Attachment

c: Carmine DeBonis, Jr., Deputy County Administrator for Public Works
Ursula Nelson, Director, Environmental Quality



MEMORANDUM

DATE: July 31, 2018

TO: C.H. Huckelberry
County Administrator

FROM: Ursula Nelson *UKN*
Director, PDEQ

RE: Tucson Electric Power Air Quality Permit

In July of 2017, Tucson Electric Power Company (TEP) submitted an application for a Prevention of Significant Deterioration (PSD) air quality permit for the Irvington Generating Station in Tucson. TEP proposed to install ten, natural gas-fired reciprocating internal combustion engines (RICE), each with a net generating capacity of 19 megawatts (MW). As part of this upgrading project, TEP will permanently cease operation of the existing natural gas fired Units 1 and 2. With this change, the net generating capacity of the facility will increase from 470 MW to 498 MW.

Because the potential to emit air pollutants will increase, the RICE project constitutes a major modification under the federal PSD regulations and requires a significant revision to their Class I operating permit. The new permit will allow increases in air pollutant emissions. In accordance with the Clean Air Act, emission increases are allowed provided the increases do not cause a violation of the health-based air quality standards and best available control technology is installed to control emissions. PDEQ plans to issue the PSD permit to TEP on August 6, 2018.

PDEQ entered into a contract with GEOSyntec, an environmental consultant, to assist with the air permitting process. Staff met regularly with the consultants, EPA, the National Park Service, TEP and others to gather information and review the results of modeling data that was necessary to determine the impact of the potential change in emissions. Based on these analyses, the proposed project will not cause a violation of the health-based air quality standards.

PDEQ had a public comment period from February 9, 2018 to March 29, 2018. PDEQ held an open house on February 15, 2018, and public hearings on March 1, 2018 and March 28, 2018. Notices were published in local papers; news releases were issued that generated media coverage; and PDEQ and Pima County websites, newsletters and list serves were used to publicize the opportunity to comment on the permit. In addition, over 9,500 invitations were mailed to businesses and households near the facility to advertise the public meetings. PDEQ also notified elected officials in local jurisdictions and adjacent counties.

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A Response to Comments document was developed and improvements were made to strengthen the permit based on the comments received.

Once the permit is issued, there will be a 30-day period when anyone who submitted a comment during the official public comment period may appeal the PDEQ permit decision to the EPA Environmental Appeals Board (EAB). If an appeal is filed with the EPA, that will stay the TEP permit until the EAB makes a ruling. The EAB may uphold the permit, modify the permit, or remand it back to PDEQ and EPA to add additional provisions.

All documents pertaining to the TEP PSD permit are available on the [PDEQ website](#).

We are available to discuss this at your convenience.

UKN/vb

cc: Carmine DeBonis, Jr., Deputy County Administrator