RESPONSIVENESS SUMMARY
TO
PUBLIC COMMENTS AND QUESTIONS

Tucson Electric Power Company – Irvington Generating Station
Significant Permit Revision
Permit Action 1052-0114P

Public Comment Period: March 14, 2022 to April 18, 2022

Public Hearing: April 15, 2022
**List of Abbreviations**

PCC ................................................................. Pima County Code
PDEQ ...................................................... Pima County Department of Environmental Quality
ADEQ ....................................................... Arizona Department of Environmental Quality
CFR .................................................................. Code of Federal Regulations
EPA ............................................................... Environmental Protection Agency
SIP ................................................................. State Implementation Plan
IGS ............................................................. Irvington Generating Station
NOx .............................................................. Nitrogen Dioxide
TEP ............................................................. Tucson Electric Power Company
Table of Contents

I. Background .................................................................................................................. 5
II. PDEQ Recommendation .......................................................................................... 5
III. Comments and Questions ....................................................................................... 5
IV. Commenters ............................................................................................................. 11
V. Virtual Hearing Transcript and Comments ............................................................. 12

List of Tables and Figures

Table 1: List of Commenters .......................................................................................... 11
I. BACKGROUND

This document contains Pima County Department of Environmental Quality’s (PDEQ or “Department”) responses to all significant comments received on the proposed significant revision to Air Quality Permit No. 1052 for Tucson Electric Power Company (TEP) located in Pima County. Irvington Generating Station (IGS) is a power plant located at 3950 East Irvington Road, Tucson, AZ. PDEQ accepted comments on the proposed Permit and technical support document (TSD) from March 14, 2022 to April 18, 2022. The Department held an Open House on March 28, 2022 at the Abrams Public Health Center, 3950 S. Country Club Road, Tucson, in Conference Room 3102. The Department held a virtual public hearing on April 15, 2022 from 5:00 PM to 6:00 PM. The Department received a total of four (4) written and oral comments on the proposed permit during the public comment period. Table 1 below lists the commenter, any organization they may represent, the format of their comments, and the page numbers where those comments can be found. The Department’s response to each comment can be found directly below each comment.

II. PDEQ RECOMMENDATION

PDEQ recommends the issuance of Air Quality Permit No. 1052 to Tucson Electric Power Company for emission limits for more stringent operational restrictions on Unit 3 to reduce Nitrogen Oxide NO\textsubscript{X} emissions on Unit 3, identified in Section VI of this permit. The proposed air quality permit for the facility identifies the applicable rules from the Pima county Code (PCC) and the Code of Federal Regulations (CFR) governing emissions from the facility and establishes practically enforceable limitations. The Department considered all comments received during the public comment period into the decision to propose the final air quality permit to the Environmental Protection Agency (EPA). The proposed permit establishes appropriate compliance procedures, including requirements for emissions testing, continuous emission monitoring, recordkeeping, and reporting. TEP will be required to carry out these procedures on an ongoing basis to demonstrate that the plant is operating within the limitations established by the air quality permit and that emissions are properly controlled.

III. COMMENTS AND QUESTIONS

A. EMISSION LIMITS

Comment 1: The proposed state implementation plan (SIP) and permit revisions are inconsistent with the Regional Haze Rule.

Response: The purpose of the proposed SIP and significant permit revision is to support ADEQ’s forthcoming periodic comprehensive regional haze SIP submittal to EPA. The inclusion of federally enforceable emission limits in regional haze SIP revisions is required by 40
CFR §51.308(f)(2) to support Arizona’s long-term strategy for this planning period. As such, it is necessary to finalize proposed permit conditions and submit them to EPA as a revision to the federally enforceable SIP in order to ensure a complete regional haze SIP submittal for the State of Arizona. The Unit 3 limits included in this proposed SIP and significant permit revision require EPA approval of ADEQ’s regional haze reasonable progress determination for Unit 3 in order to become effective.

ADEQ intends to include PDEQ’s proposed SIP revision within its proposed periodic comprehensive regional haze SIP revision that will undergo further public comment before submittal to EPA. Section VI of this significant permit revision may need to be revised and resubmitted to EPA as a revision to the Arizona SIP to satisfy the Regional Haze program if it found to be deficient for the purposes of the Regional Haze program during ADEQ’s regional haze SIP public comment period or EPA review.

Comment 2: The proposed revisions circumvent the detailed analysis and process required under the Regional Haze Program.

Response: While the eventual purpose of this permit revision is inclusion in Arizona’s Regional Haze SIP submittal, the methodology used to create ADEQ’s Regional Haze Four-Factor Analysis and associated limits is outside the scope of this permit revision. The revisions are intended to support, but are separate from, ADEQ’s forthcoming periodic comprehensive regional haze SIP revision. The action being considered in this permit revision are limits proposed by TEP for inclusion into the permit. The proposed limits do not violate any applicable requirement and are equal to or more stringent than existing limits. Similarly, while the eventual purpose of the proposed SIP revision is to support ADEQ’s Regional Haze SIP submittal, PDEQ is proposing to submit Section VI of the proposed significant permit revision as a source-specific revision to the Pima County Portion of the Arizona SIP. Therefore, the methodology used to create ADEQ’s Regional Haze Four-Factor Analysis and associated limits is outside the scope of this permit revision.

Comments on the Four-Factor analyses required under the Regional Haze program will be addressed in ADEQ’s forthcoming regional haze SIP revision public comment period. PDEQ requests these comments be resubmitted during ADEQ’s periodic comprehensive regional haze SIP revision public comment period.
Comment 3: The proposed revisions do not comply with the requirements of the Regional Haze Program.

Response: Comments related to draft ADEQ initial four-factor analysis determinations, the selection of specific controls, and whether those determinations comply with the requirements of the Regional Haze program are outside the scope of this permit revision. The action being considered in the significant permit revision is limits proposed by TEP for inclusion into the permit. The action being considered in the proposed SIP revision is the submittal of Section VI of the proposed significant permit revision as a source-specific revision to the Pima County Portion of the Arizona SIP. PDEQ requests these comments to be resubmitted during ADEQ’s periodic comprehensive regional haze SIP revision public comment period.

Comment 4: The proposed revisions fail to consider and protect environmental justice communities.

Response: PDEQ acknowledges the commenter’s support for consideration of equity and environmental justice for these revisions. All applicable requirements for public notification and participation were met for the significant permit revision and proposed PDEQ SIP revision. PDEQ requests the comments related to the consideration of equity and environmental justice impacts for the Regional Haze program to be resubmitted during ADEQ’s forthcoming periodic comprehensive regional haze SIP revision public comment period.

Comment 5: The proposed permit revision may not be used to undercut the stringency of Arizona’s Regional Haze SIP revision.

Response: The proposed limits do not violate any applicable requirement and are equal to or more stringent than existing limits. See reference comments for Authority for New Permit Conditions and Applicability of 52.21 for further discussion on origin and authority citations for the proposed permit conditions.

Comment 6: The proposed revisions are unnecessary and may cause confusion.

Response: As mentioned in the response to comment 1, the inclusion of federally enforceable emission limits in regional haze SIP revisions is required by 40 CFR §51.308(f)(2). The purpose of the proposed SIP and significant permit revision is to support ADEQ’s forthcoming periodic comprehensive regional haze SIP revision.
TEP will be required to comply with the emission limitations and or standards contained in EPA’s final action on the Arizona Regional Haze reasonable progress determination for the IGS facility. Should EPA’s final action differ from the limits in the proposed permit, TEP will be required to submit another permit application to revise the emission limitations in its permit.

Comment 7: PDEQ’s draft technical support document fails to provide the supporting documentation required under Title V of the Clean Air Act and the Pima County Code.

Response:

PDEQ disagrees with this comment. The significant permit revision incorporates voluntary emission limits into the TEP IGS permit, which is noted in the technical support document and public notice posting for the permitting action. As stated in the response to comment 2, ADEQ’s regional haze four-factor analysis is not a part of this revision. That analysis will be addressed in ADEQ’s forthcoming periodic comprehensive regional haze SIP revision, which will be available during the public comment period.

B. Applicability of 52.21

Comment 8: PDEQ is delegated by EPA to implement the PSD permitting program at 40 CFR 52.21. In 2018, TEP Irvington obtained a PSD permit pursuant to 40 CFR 52.21 for a major modification to install up to 10 natural gas-fired engines (RICE01 – RICE10). We would like to clarify that it is our interpretation that this action, which applies to EGU-I3 (“Unit 3”), is not revising the PSD permit conditions that apply to TEP Irvington pursuant to the PSD program. Thus, we do not interpret this individual action as being subject to 40 CFR 52.21 or the permit processing procedures in 40 CFR part 124. We recommend removing the language from the cover page of the permit suggesting this permit decision can be appealed to the EPA’s Environmental Appeals Board. For additional clarity, we also recommend updating the summary at the beginning of the permit to include the date when the PSD permit was issued and became effective. According to our records the PSD permit was issued on August 8, 2018 and became effective on December 3, 2018

PDEQ Response:

The Department acknowledges these comments and agrees with the requested changes to update the regulatory applicability of this
permit action. Accordingly the permit has been updated to reflect the requested changes.

C. **Authority for New Permit Conditions**

Comment 9: This action proposes to add permit requirements for Unit 3 in Section VI of the permit in support of an upcoming State Implementation Plan (SIP) submittal for ADEQ’s Regional Haze NOX Reasonable Progress determination for Unit 3. These conditions would not become effective until one year after EPA approves them as part of the SIP for Arizona. The draft permit cites the basis of these conditions as PCC 17.12.040. However, we do not interpret PCC 17.12.040, which contains language analogous to 40 CFR 70.6(a), as providing PDEQ broad authority to establish new federal applicable requirements through the title V permit program. Instead, we interpret PCC 17.12.040 as a requirement that permits must incorporate limits that have been established either as federal applicable requirements or pursuant to ARS title 49, Chapter 3. Because these requirements have not been approved by EPA into the Arizona SIP and do not otherwise meet the federal definition of an applicable requirement, they must be labeled as “Local Enforceable Only” consistent with PCC 17.12.040(B)(2). EPA recommends citing the origin and authority for these conditions as ARS 49-480(F). Additionally, EPA is not reviewing in this action whether these permit conditions meet the requirements of the Regional Haze program. That is, these permit conditions may need to be revised to satisfy the Regional Haze program.

**PDEQ Response:**

The Department acknowledges these comments and agrees with the requested changes to update the origin and authority citations of this permit action. The updated citations reference PDEQ’s authority to add the emission limits and associated monitoring, recordkeeping, and reporting requirements under P.C.C. 17.12.040(B)(2) and Arizona Revised Statutes 49-480(F) and are designated as locally enforceable only.

D. **Support**

Comment 10: One need only to look outside daily, to see one good reason to require more stringent NOX pollution controls on TEP’s Unit 3. In addition to possible harm to local flora and fauna, the persistent haze that limits the once clear views should be addressed ASAP.
The public may not be aware of the current NOx pollution, nor of any possible health effects, but every person who lives or visits here sees it on a daily basis. Tucson residents’ health and tourists' dollars depend on a healthy environment and clearer skies. Thank you.

**PDEQ Response:**

The Department acknowledges these comments.

**Comment 11:** (Provided verbally during Virtual Public Hearing). Good evening everyone, my name is Dylan Bearce, I am the director at Tucson power production, at Tucson Electric Power Production Company, and responsible official of the Irvington Generating Station. The station is also known as H Wilson Sundt generating station and I appreciate the opportunity to provide comments tonight. I’m supportive of this significant permit revision for Irvington Generating Station and the corresponding revision to the Pima County portion of the Arizona State Implementation Plan. In this permit action TEP, voluntarily takes new emission limits for nitrogen oxides and well as new monitoring, recordkeeping and reporting requirements for unit 3 and unit 3 is an electric steam-generating unit at the Irvington Station. The permit revision will benefit our environment by creating the bright line NOX emission limits while maintaining safe affordable and reliable operation of Unit 3. Also, the new monitoring and reporting requirements, will ensure members of our community and our regulators continue to have access to up to date operational information from the unit. Irvington generating station is committed to being a good steward, partner and employer here in the city of Tucson, Pima County and this permit revision reinforces that commitment. Thank you again for the opportunity to contribute to the hearing and I also want to thank Pima County DEQ for holding a public open house for the permit revision on March 28. Thank you

**PDEQ Response:**

The Department acknowledges these comments and thanks TEP for their continual compliance with the air quality permit conditions.

**Comment 12:** (Provided verbally during Virtual Public Hearing). Denise Garland. I am the president of the Gates pass Neighborhood Association, we were established in 1987 and currently representing 240 members who live on the west side Tucson Pima
County Area. They, well the location of TEP’s unit 3 is not within our boundaries of area of focus, it is just a short drive and I have a lot of our members that are concerned about the Nitrogen oxide that’s really, -pause- the emissions that are currently being put into the air and the consequences of those. The timeframe also at this point, the, many of our members are very concerned about the continuing to put that chemical into our air and feel that the timeframe is unacceptable and impacts all Tucson residents, Pima county residents. It is well documented that the Nitrogen oxide in the air and air pollution has both severe and cumulative effects on the human health, many members are retired members, our community who already have health issues, that will be made worse by the extended higher levels of emissions and that continue. The other thing is the air quality is not, if the air quality is not improved, also, it can impact our economy as well as our folks staying in this area. The air Quality can affect our animals our plants which is a very big deal for folks over here on the west side. They may die more rapidly, and residents may not want to live, work and spend their income here in Pima County. The 240 members for Gates Pass Neighborhood Association want to feel safe drinking their water, hiking in the local mountains and yes breathing the local air. I think getting community input, you’ve done a lot of great things but having this meeting tonight, on a Friday at 5, especially Good Friday just shows the insincerity to gathering all the information you can from the community. The Gates Pass Area Neighborhood Association does oppose the proposed revision; we do feel that TEP is not a genuine partner in our community. Our high-powered lines is the other issue we are dealing with them about and we just feel like we want to see the Nitrogen Oxide emissions reduced immediately and we hope that Pima county and the City of Tucson will act to hold TEP accountable immediately to reduce these emissions. Thank you for letting me speak.

**PDEQ Response:**

The significant permit revision does not allow for the increase in emissions of any criteria pollutant. Rather, the significant permit revision incorporates more stringent emission limits for Unit 3. The purpose of this revision is to incorporate voluntary emission limits into the permit and Pima County portion of the Arizona SIP. TEP IGS is currently complying with all existing local, state, and federal requirements.

Consideration of impacts to tourism, and native local plants and animals are outside the scope of this permit and SIP revision.
IV. COMMENTERS

Table 1 lists the names of the commenter, the organization they represent (if any), and how the comment was received by the Department. The table also shows the individual what page their comment and the Department’s response can be found.

**Table 1: List of Commenters**

<table>
<thead>
<tr>
<th>Commenter No.</th>
<th>Commenter</th>
<th>Organization (if any)</th>
<th>Comment Format</th>
<th>Page Number(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 - 7</td>
<td>Michael Hiatt</td>
<td>Earth Justice, Sierra Club, National Parks</td>
<td>Written</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Marta Darby</td>
<td>Conservation Association</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8, 9</td>
<td>Lisa Beckham</td>
<td>EPA Region 9</td>
<td>Written</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Karen Sweeney</td>
<td>Resident of Pima County</td>
<td>Written</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Dylan Bearce</td>
<td>Tucson Electric Power</td>
<td>Oral During Public Hearing</td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Denise Garland</td>
<td>Gates Pass Area Neighborhood Association</td>
<td>Written &amp; Oral During Public Hearing</td>
<td></td>
</tr>
</tbody>
</table>
IV. VIRTUAL HEARING TRANSCRIPT AND COMMENTS
PUBLIC HEARING REGARDING
THE PROPOSED AIR QUALITY PERMIT REVISION
FOR
TUCSON ELECTRIC POWER
IRVINGTON GENERATING STATION
AND
PIMA COUNTY SIP REVISION
APRIL 15, 2022

SLIDE 1
Virtual Public Hearing will begin at 5:00 p.m. and end at 6:00 p.m.

SLIDE 2
Hearing Officer:
Good evening and thank you for taking the time to attend this hearing. Just doing a mic check, Natalie can you hear me? Yes (Natalie). Excellent, Ok. Good evening, the time is approximately, 5.01 and I am the Hearing Officer, from Pima county Department of Environmental Quality.

This public hearing is being conducted virtually due to the current Covid-19 pandemic. Like I said, I am the hearing officer representing Pima County Department of Environmental Quality and I will be presiding this hearing. The other PDEQ representatives here tonight are:

- PDEQ Deputy Director Barbara Escobar
- PDEQ Senior Program Manager for Outreach & Education, Natalie Shepp
- PDEQ Compliance Manager Jacqueline Ronstadt,
- Marie Light, the Principle Hydrologist – who is here to answer questions in Spanish.
- EPA Region 9 Administrator, Environmental Engineer, Lisa Beckham.

At this moment, we are conducting a formal public hearing. As an Air Quality Control District, PDEQ has jurisdiction over facilities requiring an Air Quality Permit in Pima County.
The purpose of this hearing is to allow residents the opportunity to enter into record, oral or written comments regarding the proposed revision of the air quality permit and the proposed revisions to the Pima County portion of the Arizona State Implementation Plan.

The facility Tucson Electric Power, Irvington H. Wilson Sundt Generating Station is located at 3950 East Irvington Road, in Tucson, Arizona. I will hereby refer to this facility as TEP.

**SLIDE 3**

By law, a public hearing must contain certain requirements.

- A minimum 30-day advance public notice must be given in two newspapers of general circulation. The official comment period for this permit and SIP revision began on March 14, 2022. Notice was given in the Arizona Daily Star and the Daily Territorial on Monday March 14, 2022 and Monday March 21, 2022.

- The public must be given an opportunity to speak or to give written comments during the hearing. Tonight the public has an option to do so and the comments may be received by PDEQ until 5 p.m. on Monday April 18, 2022.

- A hearing must be conducted on record, which means that it is recorded in some way and tonight’s meeting is being recorded.

This hearing is considered a formal hearing under state law. A formal public hearing is different from the public meeting. In a public meeting, there is an opportunity for questions and answers between the general public and the department. That opportunity and open house was held on March 28, 2022 from 5:00 p.m. to 6:30 p.m. in conference room 3102 at the Abrams Public Health Center in Tucson.

As for tonight, this is a public formal public hearing, the representatives of the department will not be formally answering any permit related questions. In other words, neither I nor anyone from the department will be answering any questions at this public hearing. I can only repeat or clarify what I read to you from the slides.
At the end of the 36-day public comment period, PDEQ will prepare written response to all significant permit related questions and comments that have been entered into record regarding the proposed permit revision and the proposed revision to the Pima County portion of the Arizona State Implementation Plan.

SLIDE 4
The agenda for tonight’s hearing is as follows: first, I will give a brief description about the Regional Haze Rule and the proposed additional emission reductions in the Air Quality Permit. Then I will then begin to call speakers by name to take, to begin taking public comment.

If you wish to comment, you need to use the raised hand button on this virtual hearing platform. PDEQ staff are monitoring the attendees to allow everyone who wished to speak to have the opportunity to provide comment.

I will call individuals in the order that I see the raised hand. For the record, please say your name before you give us your comment and I ask that comments be no more than 3 minutes long so everyone who wishes to make a comment is given the opportunity to do so. In lieu of speaking, you may also provide written comments this evening. Written comments can also be sent to air.permits@pima.gov. If you wish to do so, you may make both oral and written comments tonight.

For those that have joined us tonight on their phone, you appear on my screen as a sequential caller. Therefore, I do not have the ability to identify you who is on the line. I will do is to unmute each line and call the caller to state their name and then I will then move onto the next caller to provide comment.

Once again, the purpose of this hearing is to receive comment from the public on the proposed permit revision for TEP and the PDEQ SIP. By law, all the comments made here or in writing are considered by PDEQ before our final decision is being made. The department has a duty to evaluate and respond in writing to all written and verbal comments that is received. This document is known as the response to comments summary and it will be available at the time the department
makes a final decision regarding the permit revision. If you wish to be notified about the final permit decision made by the department, please be sure to indicate that in your formal comment.

SLIDE 5
I will be giving a brief summary of the proposed permit and SIP revision. For more detailed description of this revision, PDEQ has posted the permit application and all of the supporting documents on our website.

The basic goal of our proposed revision is to address a component of the 2017 Regional Haze Rule, which mandates gradual progress toward restoring natural visibility conditions at designated national parks and wilderness areas.

Haze is caused when sunlight encounters tiny pollution particles in the air. More pollutants means you have a less clear view. Air pollutants come from a variety of natural and manmade sources. Natural sources include windblown dust, and soot from wildfires. Manmade sources can include motor vehicles, electric utility and industrial fuel burning.

TEP will aid in the progress toward the states goal of improving visibility at our scenic areas by reducing NOx emissions.

SLIDE 6
Now the proposed changes to the permit will include additional enforceable operational restrictions on Unit 3 to reduce NOX emissions. A review of available combustion controls are not cost effective pursuant to the federal regional haze program. Therefore, TEP will be restricted to one of three options identified in Section 6 of the permit.

PDEQ is also proposing revisions to the Pima County portion of the Arizona State Implementation Plan (SIP) to support the enforceability of ADEQ’s long-term strategy to reduce regional haze.
These additional more stringent NOx limits shall become effective one year after the U.S. Environmental Protection Agency approves ADEQ’s Regional Haze NOX Reasonable Progress determination for Unit 3 and adopting Section 6 of this permit as part of the State Implementation Plan for Arizona.

**SLIDE 7**
Section 6 of the permit includes the following proposed additional operational restrictions for the purpose of reducing NOX emissions.

(a) 335 tons per 12-month rolling total  
(b) 753 tons per 36-month rolling total and  
(c) 1,285 cumulative tons for the remaining life of the unit. The unit must shut down permanently before the cumulative limit is exceeded.

Compliance is determined by a continuous emissions monitoring system.

TEP remains to be in compliance with all permit and regulatory requirements and inspections by PDEQ staff have been conducted regularly.

**SLIDE 8**
So this marks the end of the TEP facility and permit summary. We will now begin taking formal comment. I would again like to remind people that if you wish to speak, please use the raised hand button on this WebEx virtual hearing. To do this you will first need to open the participant list and then select I presume a little human button to then allow you to see the raised hand button.

I will unmuting each member to allow them to speak. To ease transcribing later please speak clearly into your microphone.

Now our first speaker I will call upon is the director of Tucson power Production for TEP name by Dylan Bearce. Dylan are you on the line?
Yes, I’m here, Dylan Bearce is here.

Excellent, go ahead and provide your brief please.

Sounds Good, Good evening everyone, my name is Dylan Bearce, I am the director at Tucson power production, at Tucson Electric Power Production Company, and responsible official of the Irvington Generating Station. The station is also known as H Wilson Sundt generating station and I appreciate the opportunity to provide comments tonight. I’m supportive of this significant permit revision for Irvington Generating Station and the corresponding revision to the pima county portion of the Arizona State Implementation Plan. In this permit action TEP, voluntarily takes new emission limits for nitrogen oxides and well as new monitoring, recordkeeping and reporting requirements for unit 3 and unit 3 is an electric steam-generating unit at the Irvington Station. The permit revision will benefit our environment by creating the bright line NOX emission limits while maintaining safe affordable and reliable operation of unit 3. Also, the new monitoring and reporting requirements, will ensure members of our community and our regulators continue to have access to up to date operational information from the unit. Irvington generating station is committed to being a good steward, partner and employer here in the city of Tucson, Pima County and this permit revision reinforces that commitment. Thank you again for the opportunity to contribute to the hearing and I also want to thank Pima County DEQ for holding a public open house for the permit revision on March 28. Thank you.

Thank you Mr. Bearce. I would certainly like to then move onto the attendees list to look at any raise hands know I do one next to Denise Garland (DG). Denise, I’m going to unmute your line and if you would like to speak clearly into the microphone and introduce yourself. One moment please.

Go ahead Denise can you hear me?
(DG). I can hear you can you hear me?

I can, go ahead and provide your comment please Denise.

I am the president of the Gates pass Neighborhood Association, we were established in 1987 and currently representing 240 members who live on the west side Tucson Pima county Area. They, ahh, well the location of TEP’s unit 3 is not within our boundaries of area of focus, it is just
a short drive and I have a lot of our members that are concerned about the Nitrogen oxide that’s really ahh, the emissions that are currently being put into the air and the consequences of those. The timeframe also at this point, the, many of our members are very concerned about the continuing to put that chemical into our air and feel that the timeframe is unacceptable and impacts all Tucson residents, Pima county residents. It is well documented that the Nitrogen oxide in the air and air pollution has both severe and cumulative effects on the human health, many members are retired members, our community who already have health issues, that will be made worse by the extended higher levels of emissions and that continue. The other thing is the air quality is not, if the air quality is not improved, also, it can impact our economy as well as our folks staying in this area. The air Quality can affect our animals our plants which is a very big deal for folks over here on the west side. They may die more rapidly, and residents may not want to live, work and spend their income here in Pima County. The 240 members for Gates Pass Neighborhood Association want to feel safe drinking their water, hiking in the local mountains and yes breathing the local air. I think getting community input, you’ve done a lot of great things but having this meeting tonight, on a Friday at 5, especially Good Friday just shows the insincerity to gathering all the information you can from the community. The Gates Pass Area Neighborhood Association does oppose the proposed revision; we do feel that TEP is not a genuine partner in our community. Our high-powered lines is the other issue we are dealing with them about and we just feel like we want to see the Nitrogen Oxide emissions reduced immediately and we hope that Pima county and the City of Tucson will act to hold TEP accountable immediately to reduce these emissions. Thank you for letting me speak.

Thank you very much for your participation tonight. We appreciate your comment.

I’m just looking down the list of the rest of the attendees. At this stage, I do not see any further people. The time is approximately 5:17pm. I will continue to stay on this platform to wait for any additional people to join us. The time is approximately 5.18; I’m going to go off record to give others time to join us. If there are no additional participants joining us before 6pm, we will come back onto record to allow me to close the hearing. Thank you.

The time is now 5.58 on Friday April 15, 2022 and we are back on record to proceed with the TEP air quality permit revision and the PDEQ SIP revision public hearing. Before I close, I would like
to give anyone a final opportunity to make a comment. Seeing no raised hands on the attendees list, and no additional person the line. I was to recognize the two verbal comments we have received this evening from Dillan Bearce, representing TEP and also Denise Garland representing the Gates Pass Area Neighborhood Association.

I shall conclude this hearing with a reminder that the public comment for this permit decision remains open until close of business on April 18, 2022. The department’s response to comments will be developed in the next few weeks to address any comments received. This document will be posted on the PDEQ web site. If you would like it sent to you, please send a request to air.permits@pima.gov. At this point, I will now close the hearing. Your interest is appreciated and PDEQ thanks you for your time attending.

The hearing is closed. Today’s date is Friday April 15, 2022. The time is 6:00pm. Thank you.
Public Hearing - Tucson Electric Power – Irvington Generating Station

April 15, 2022

Virtual Public Hearing will begin at 5:00 p.m.
and end at 6:00 p.m.

Please be patient while we prepare the meeting.
April 15, 2022

PUBLIC HEARING REGARDING THE PROPOSED AIR QUALITY PERMIT REVISION FOR TUCSON ELECTRIC POWER IRVINGTON GENERATING STATION AND PIMA COUNTY SIP REVISION
Public Hearing Requirements

- Min 30 day advance notice.
- Opportunity to provide oral and written comments.
- Hearing must be recorded.

PDEQ held a Public Meeting to answer questions at the Open House on March 28, 2022.

Formal Public Hearing - PDEQ Staff will not be answering any questions.

36 Day comment period ends on Monday April 18, 2022

All the comments made here or in writing are considered by PDEQ before our final decision is being made.

If you would like to provide verbal comment, please use the Raise Hand Button. PDEQ staff will invite you to speak by calling your name.
The comment period for this project ends on April 18, 2022

Please submit your written comments to air.permits@pima.gov

If you would like to provide verbal comment now, please use the Raise Hand Button. The raised hand button is being monitored.

PDEQ staff will invite you to speak by calling your name.

Please be patient for your name to be called.
- **Regional Haze Rule**
  - Calls for state and federal agencies to work together to secure meaningful reductions in visibility impairing pollutants.

- **What is Regional Haze?**
  - Haze is air pollution blurring the view.

- **Where does Haze pollution come from?**
  - Natural sources - windblown dust soot from wildfires
  - Manmade sources - motor vehicles, electric utility and industrial fuel burning
  - TEP will aid in the progress toward natural visibility by reducing Nitrogen Oxide emissions.

If you would like to provide verbal comment, please use the Raise Hand Button. PDEQ staff will invite you to speak by calling your name.
NOx Emission Limit for Irvington Generating Station Unit 3

- Began commercial operation in 1962, a boiler that was originally designed to burn both oil and natural gas and now burns natural gas exclusively.

- PDEQ is proposing new NOx limits for Unit 3, which will result in emissions reductions.

- Combustion Controls are not cost effective pursuant to the federal regional haze program.

- PDEQ is also proposing revisions to the Pima County portion of the Arizona State Implementation Plan (SIP) to support the enforceability of ADEQ’s long-term strategy to reduce regional haze.

- TEP will select one of a number of options no later than 1 year after the SIP approval.

If you would like to provide verbal comment, please use the Raise Hand Button. PDEQ staff will invite you to speak by calling your name.
NOx Emission Limit for Irvington Generating Station Unit 3

- The Permittee shall ensure that the NOX emissions from Unit 3 shall not exceed either of the following limits:

  - (a) 335 tons per 12-month rolling total;
  - (b) 753 tons per 36-month rolling total and
  - (c) 1,285 cumulative tons for the remaining life of the unit. The unit must shut down permanently before the cumulative limit is exceeded.

- Compliance is determined by a continuous emissions monitoring system.

- To date TEP remains in compliance with all regulatory requirements of their air quality permit.
The comment period for this project ends on April 18, 2022

Please submit your written comments to air.permits@pima.gov

If you would like to provide verbal comment now, please use the Raise Hand Button

PDEQ staff will invite you to speak by calling your name.

Please be patient for your name to be called.