

Tucson Electric Power Company

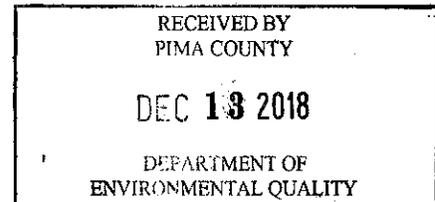
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Telephone 571-4000

Hand Delivery

December 13, 2018

Mr. Rupesh Patel
Air Program Manager
Pima County Department of Environmental Quality
33 N. Stone Ave, Suite 700
Tucson, Arizona 85701



Dear Mr. Patel:

Subject: Facility Change Notification, Irvington Generating Station (“IGS”), PSD Permit No. 1052

Pursuant to PCC 17.12.090, Tucson Electric Power Company (“TEP”) herewith submits notification concerning a change as follows:

1. When will the proposed change occur?

Upon or after PDEQ’s approval

2. A description of each such change

TEP is proposing, and submitting this notice for PDEQ’s approval, to install two heat recovery steam generating units (HRSG) at RICE Units 5 and 6, respectively. The HRSG units will be deployed and operated to recover the waste heat available in the RICE exhaust gas and produce steam to be supplied to an adjacent asphalt storage facility. By design, the heat recovery process does not encompass any combustion and thus, results in no emissions of any regulated air pollutant.

Additional dispersion (AERMOD) and visibility (PLUVUE) modeling runs were performed to accommodate the exhaust temperature/velocity affected by the two HRSG units. Although the results are slightly different numerically from previous modeling runs, the overall conclusion remains unchanged, that is, modeling shows no exceedance of any Class I or Class II significant impact levels (SILs) and statistically very infrequent visibility excursion. The revised dispersion and visibility modeling reports are attached for your records.

3. Any change in emissions of regulated air pollutants

No change in emissions of regulated air pollutants is expected as a result of the addition of the HRSG units.

4. The pollutants emitted subject to the emissions trade, if any

Not applicable.

5. **The provisions in the implementation plan that provide for the emissions trade**
Not applicable.
6. **If the emissions trading provisions of the implementation plan are invoked, the requirements with which the source will comply**
Not applicable.
7. **Any permit term or condition that is no longer applicable as a result of the change**
None.

In addition, this submittal includes Prevention of Significant Deterioration updates for the following modeling reports; 1) Air Quality Dispersion Modeling Report in Support of the Application for a PSD Authorization and Significant Revision to Class I Air Quality Permit for Irvington Generating Station (Revision 3 dated October 22, 2018), and 2) Tucson Electric Power Company Irvington (Sundt) Generating Station: PLUVUE II Assessment of Visible Plumes at Saguaro National Park East and West (Revision 1 dated October 22, 2018).

With this submittal, TEP also requests that PDEQ approve the facility change notification in writing. If you have any questions in this matter, please contact Chuck Komadina at (520) 918-8316 or Zig Fang at (520) 918-8380.

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate and complete.

Sincerely,



Conrad Spencer
Director, Sundt Generation Modernization Project

cc: R. Grimaldi, PDEQ
C. Komadina, TEP