



Tucson Electric Power

88 East Broadway Blvd.
Tucson, AZ 85701-1720
P.O. Box 711, Tucson, AZ 85702

April 8, 2020

VIA ELECTRONIC MAIL

Rupesh.patel@pima.gov and Jaqueline.Ronstadt@pima.gov

Pima County Department of Environmental Quality (“PDEQ”)

ATTN: Rupesh Patel, Air Program Manager and

Jacqueline Ronstadt, Air Compliance Manager

33 N. Stone Ave, Suite 730

Tucson, AZ 85701

**RE: Irvington Generating Station (“IGS”) Units 1 and 2
Decommissioning Project Update (D19AB10 – PP45016)
Title V Air Permit Number 1052**

Dear Mr. Patel and Ms. Ronstadt,

Tucson Electric Power Company (“TEP”) is writing this letter to follow-up on its letter submitted to the Environmental Protection Agency (“EPA”) on November 26, 2019 and its meeting with PDEQ on March 31, 2020. As required by TEP’s Title V Air Permit, prior to the initial start-up of any Reciprocating Internal Combustion Engine, TEP decommissioned Units 1 and 2 (collectively referred to as “Units”) at IGS. Due to the complexities of the decommissioning and removal of the Units, decommissioning activities are still ongoing. However, from the completed activities, the Units are no longer operational. To further demonstrate the Units are not operational, TEP has outlined the completed activities below and attached photos documenting such activities (see Figures 1-5).

Fluid/Gas Removal

TEP isolated and removed most fluids, gases (oil, N.G., water, chemical, waste, etc.), and flammables (fluids, oil, N.G., cooling towers, etc.) from the Units. Isolating and removing fluids, gases, and flammables does not allow for auxiliary equipment critical to the operation of the boiler or turbine to operate. For example, the only fossil fuel source supply to the Units, natural gas, was severed and the piping capped (see attached Figures 1 & 3 demonstrating this). Thus, combustion is not possible.



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Removal of Connection to Substation

In addition, TEP separated the generator step-up transformers (“GSU”) from the substation (see attached Figures 2 & 4). Thus, the Units are unable to provide power to the substation and operate.

Cooling Tower Removal

TEP physically removed the cooling towers from IGS (see attached Figure 5). The removal of the towers eliminated the ability of steam to be condensed, leaving the Units inoperable.

TEP also implemented further protection measures, until the Units can be fully removed from IGS:

- Conduct safety and integrity inspections of the Units on a regular basis; and
- Ensure adequate access, lighting, fire protection, electrical and control to the remaining structures.

TEP re-engineered and implemented new electrical and control station configurations, to ensure reliable operations, based on the decommissioning activities. TEP anticipates that it is likely to complete the decommissioning activities in the next 18-24 months. However, based on the completed activities, TEP can no longer operate the Units. Should you have any additional concerns, please feel free to let me know.

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

A handwritten signature in blue ink, appearing to read "Dylan Bearce", is written above a horizontal line.

Dylan Bearce, Plant Director



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Figure 1 - Unit 1 Main Gas Supply





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Figure 2 – Unit 1 GSU





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Figure 4 – Unit 2 GSU





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Figure 5 – Units 1 and 2 Cooling Tower Removal

