

From: [Roger Anyon](#)
To: [Rupesh Patel](#)
Cc: [Kimberly Baeza](#)
Subject: RE: Tucson Electric Power - Cultural Resources Inventory and Historic Building Assessment
Date: Thursday, August 31, 2017 5:24:07 PM

Hi Rupesh:

Thank you for submitting this report for my review (WestLand Cultural Resources Report 2017-202, dated June 8, 2017). I concur with the recommendations of the report:

1. Site AZ AA:12:875(ASM), the in service El Paso Natural Gas Pipeline No. 1007, is exempted from cultural resources compliance requirements by the Advisory Council on Historic Preservation,
2. Archaeological site AZ BB:13:854(ASM) is no longer extant and thus no warrants no further consideration,
3. Site AZ BB:13:895, the Irvington Generating Station, is ineligible to either the Arizona or National Registers of Historic Places, and that no further cultural resources work is needed, and
4. TEP and its contractors must abide by the requirements of ARS 41-865 should any human remains be discovered during construction activities.

From the perspective of Pima County cultural resources compliance requirements, TEP may proceed with any demolition and construction.

I note that the IGS is within the City of Tucson, and thus the City Historic Preservation Officer may be interested in this report and its recommendations. The contact for the City is Jonathan Mabry who can be reached at Jonathan.Mabry@tucsonaz.gov

Roger Anyon
Office of Sustainability and Conservation
520-724-6405.

From: Rupesh Patel
Sent: Thursday, August 31, 2017 2:56 PM
To: Roger Anyon <Roger.Anyon@pima.gov>
Cc: Kimberly Baeza <Kimberly.Baeza@pima.gov>
Subject: Tucson Electric Power - Cultural Resources Inventory and Historic Building Assessment

Good afternoon Roger,

Tucson Electric Power Company (TEP) operates its Irvington Generating Station (IGS) under Class I Air Quality Operating Permit No. 1052 issued by the Pima County Department of Environmental Quality (PDEQ). IGS consists mainly of four steam boiler generating units, namely, Unit 1, Unit 2, Unit 3 and Unit 4. As you may aware, TEP is proposing to modernize the station by replacing two 1950's era steam units (i.e., Units 1 and 2) with ten high-efficiency, fast-responding, state-of-the-art reciprocating internal combustion engines (RICE), each having a generating capacity of nearly 19

MW. The RICE project expects to be a major modification for CO, PM2.5/PM10 and VOCs subject to the Prevention of Significant Deterioration (PSD) permitting as such, the air quality dispersion modeling is required for the affected criteria pollutants.

In support of the necessary permit revision application TEP has submitted the attached Cultural Resources Inventory and Historic Building Assessment. Kimberly Baeza of PDEQ suggested that you may be our point person to evaluate and provide comment on this report submittal. PDEQ kindly requests your input and guidance on how we should process this report. Are there any other regulatory agency's we need to contact to provide input?

Thank you

Rupesh Patel
Air Permit Engineering Manager
Pima County Department of Environmental Quality
Tucson, Arizona
Tel: (520) 724-7341
Web Site: [PDEQ Air Program](#)

From: Kimberly Baeza
Sent: Wednesday, August 30, 2017 11:32 AM
To: Rupesh Patel <Rupesh.Patel@pima.gov>
Subject: county cultural contact

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