



**PIMA COUNTY**  
ENVIRONMENTAL QUALITY  
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Ursula Kramer Nelson, P.E.  
Director

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1 September 2017

Mr. Conrad Spencer  
Director, Tucson Power Production  
Tucson Electric Power Company  
88 East Broadway Boulevard, Mail Stop HQW602  
Tucson, Arizona 85702

[CSpencer@tep.com](mailto:CSpencer@tep.com)

Subject: Air Quality Dispersion Modeling Protocol  
Tucson Electric Power Irvington Generating Station  
Permit No. 1052

Dear Mr. Spencer:

On 23 June 2017, the Pima County Department of Environmental Quality (“PDEQ”) received the Tucson Electric Power Company (“TEP”) Irvington Generating Station’s dispersion modeling protocol. The protocol, entitled *Tucson Electric Power Company Irvington (Sundt) Generating Station: Air Quality Dispersion Modeling Protocol*, dated June 23, 2017, was submitted in support of TEP’s air permit application for ten proposed Reciprocating Internal Combustion Engines (RICE).

PDEQ has reviewed the proposed analysis and we hereby provide a conditional approval of the air quality dispersion modeling protocol, with the following limitations:

- The entire extent of the facility property boundary indicated in the modeling protocol is, or will be, fenced; and
- Each stack will be located within one diameter of every other stack in a merged group.

Should you have any questions or need additional information please do not hesitate to contact me at (520) 724-7341.

Sincerely,



Rupesh Patel  
PDEQ Air Permit Engineering Manager

Copies to: Charles W Komadina, Tucson Electric Power  
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