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

Subject: Cultural Resources Inventory and Historic Building Assessment
Irvington Generating Station
Permit No. 1052

Dear Mr. Spencer:

On 28 August 2017, the Pima County Department of Environmental Quality (PDEQ) received the Cultural Resources Inventory and Historic Building Assessment prepared by WestLand Resources to support the Application for a Prevention of Significant Deterioration (PSD) Authorization and Significant Revision to Class I Air Quality Permit for the Irvington Generating Station (IGS) located at 3950 East Irvington Road in Tucson, Arizona. PDEQ forwarded WestLand’s assessment (dated 8 June 2017) to the Pima County Office of Sustainability and Conservation (PCOSC) and the City of Tucson (COT) Historic Preservation Program for their review and comment. A summary of the PCOSC and COT findings is presented below:

1. Comments from Roger Anyon of PCOSC (email message dated 31 August 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 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.
11 September 2017
Cultural Resources Inventory and Historic Building Assessment

2. Comments from Allison Diehl of the COT Historic Preservation Program (email message dated 9 September 2017)

    The City of Tucson Historic Preservation Office has reviewed this report. It is a very interesting read, and some of the information dovetails nicely with our ongoing historic streetlight research. There are no deficiencies from our standpoint.

The emails from Roger Anyon and Allison Diehl are attached for your record. PDEQ is not requesting any additional information or revisions to the Cultural Resources Inventory and Historic Building Assessment. Should you have any questions or need additional information please do not hesitate to contact me at 520-724-7341.

    Sincerely,

    [Signature]

    Rupesh Patel
    PDEQ Air Permit Engineering Manager

Attachment A  PCOSC and COT Correspondence

Copies to: Charles W Komadina, Tucson Electric Power
          Suzanne Kennedy, Geosyntec Consultants
          Kate Graf, Geosyntec Consultants
          Scott McCann, Geosyntec Consultants
          Shelia (Ya-Ting) Tsai, EPA R9
          Eugene Chen, EPA R9
          Cleve Holladay, EPA R9
Attachment A
PCOSC and COT Correspondence
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 B8:13:895, 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.

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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 I, 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
Hello Rupesh,

The City of Tucson Historic Preservation Office has reviewed this report. It is a very interesting read, and some of the information dovetails nicely with our ongoing historic streetlight research. There are no deficiencies from our standpoint.

If this had been done for the City’s on-call, we would have asked for the removal of federal terms from the abstract and questioned the assignment of a site number to the in-use electrical generating station (per ASM’s “Policy and Procedures Regarding Historical Sites and Features,” December 2016). Also, it would be interesting to see more discussion on the “Tucson and Apache Pass” road found on GLO maps and its possible connection with the old Butterfield stage route.

Thank you for forwarding this.

Allison

Allison Diehl
City of Tucson Historic Preservation Program
(520) 837-6022

Diehl Research, LLC
(520) 444-5638