



**PIMA COUNTY**  
ENVIRONMENTAL QUALITY  
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Ursula Kramer Nelson, P.E.  
Director FAX (520) 838-7432

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12 September 2017

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.*

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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,



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

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Cultural Resources Inventory and Historic Building Assessment

Attachment A  
PCOSC and COT Correspondence

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Cultural Resources Inventory and Historic Building Assessment

**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

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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](mailto: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](mailto:Roger.Anyon@pima.gov)>  
**Cc:** Kimberly Baeza <[Kimberly.Baeza@pima.gov](mailto: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

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**From:** [Allison Diehl](#)  
**To:** [Rupesh Patel](#)  
**Cc:** [Roger Anyon](#); [Jonathan Mabry](#)  
**Subject:** Tucson Electric Power Irvington Station Cultural Report  
**Date:** Thursday, September 7, 2017 12:09:44 PM

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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