

Rupesh Patel

From: Notar, John <john_notar@nps.gov>
Sent: Thursday, October 12, 2017 11:45 AM
To: Rupesh Patel
Cc: Kirsten King; John Notar
Subject: Re: Tucson Electric Power

Follow Up Flag: Follow up
Flag Status: Flagged

Rupesh: I regret the delay in getting comments to you regarding Tucson Electric Irvington (Sundt) modeling protocol. My primary comment regards the coherent visible plume (VISCREEN) analysis for both Saguaro East and Saguaro West presented in Appendix "C", Section 5. Although Tucson Electric may "net out" of conducting an increment analysis for the project's NOx emissions, it is our contention that the project's new NOx emissions also be included in the coherent plume blight analysis in addition to the project's PM 2.5 and H2SO4 emissions. Emissions that result in a coherent visible plume cannot be offset in a netting procedure due to the fact that it is the combination of the NOx, PM 2.5 and H2SO4 emissions along with the geometry of sun angle and terrain or sky background which determines a visible plume impact. The retiring NOx emissions from the older units will have a different location of origin, a different plume height, a different sun angle and different plume character. In addition, the NPS has not received the necessary information regarding the short term/hourly emission rates for the 10 RICE engines. The NPS is requesting that a corrected visible plume analysis be submitted for both Units (East and West) with 2 two emission scenarios. One emission scenario would be all 10 engines operating at normal conditions with 1 hour emission rates and the SCR controls operating at full efficiency. The other emission scenario is for the RICE engines operate in a cold startup mode for one half hour and the second half of that hour emit as warmed up units and being controlled with the SCR controls. Therefore the visible plume analysis will be conducted to both Saguaro Units in full warmed up mode and in a start up mode. If you have any regarding the visibility please contact me via phone or e-mail. If you have questions regarding control issues please contact Kirsten King (303)-969-2341 of our NPS Air Division.

Thank You

John NotarJohn Notar

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On Wed, Oct 4, 2017 at 3:20 PM, Rupesh Patel <Rupesh.Patel@pima.gov> wrote:

Hi Kirsten,

I understand and remain patient on the expected comments from your modeler. Please let me know at your earliest convenience when we should expect to hear from you.

Thank you.

Rupesh

Rupesh Patel

Air Permit Engineering Manager

Pima County Department of Environmental Quality

Tucson, Arizona

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From: King, Kirsten [mailto:kirsten_king@nps.gov]

Sent: Wednesday, September 27, 2017 10:42 AM

To: Rupesh Patel <Rupesh.Patel@pima.gov>

Cc: Bret Anderson <baanderson02@fs.fed.us>; Notar, John <john_notar@nps.gov>

Subject: Tucson Electric Power

Rupesh,

I wanted to get back to you regarding the modeling comments. Our modeler has been out dealing with family matters, we will get you comments as soon as he returns. I apologize for the inconvenience.

Thank you

Kirsten

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Kirsten King

Environmental Engineer

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