

Title V/Clean Air Act: Sierra Club Petition to Object Filed Addressing Pinal County, Arizona, Generating Station



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The Sierra Club filed a May 13th Title V Petition to Object (“Petition”) before the United States Environmental Protection Agency (“EPA”) related to the Salt River Project Agricultural Improvement and Power District (“SRP”).

The Title V Petition objects to the Pinal County, Arizona, issuance of a Title V permit to SRP for the Coolidge Generation Station (“Station”).

Title V of the Clean Air Act requires certain stationary sources of air pollution to obtain Operating Permits. States or other governmental entities that administer Title V do so through adopted implementation plans. These plans are submitted to and approved by EPA. The intent of a Title V permit is to organize in a single document all the requirements which apply to the permit holder.

42 U.S.C. § 7661 requires that states submit each proposed Title V permit to EPA for review. Section 505(v)1 of the Clean Air Act requires that EPA object to the issuance of a proposed Title V permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting documentation) if the federal agency determines that it was not in compliance with the applicable requirements under the Clean Air Act.

If EPA does not object to a permit, § 505(v)2 provides that any person may petition the EPA administrator, within sixty (60) days of the expiration of the 45-day review period to object to the permit.

The Station is described by the Petition as an existing electric peaking power generating facility that is owned and operated by SRP. The existing Facility is stated to consist of 12 simple-cycle natural gas-fired combustion turbines that include:

- Water injection and selective catalytic reduction to reduce NOx emissions.
- Oxidation catalysts to reduce CO and VOCs.
- Continuous Emission Monitoring Systems for NOx and CO.
- 190-horsepower diesel-fired emergency fire pump.
- Ancillary equipment.

The existing Facility is stated to have an electric generating capacity of 570 megawatts.

The Petition describes an expansion project for the Facility which is the subject of the Title V permit objection.

The Sierra Club cites as grounds for objection to the Title V permit modification:

- The EPA Administrator must object to the final permit because PCAQCD failed to require NNSR and PSD review of the existing Facility and expansion project.
- The air modeling analysis relies on improper background concentrations to find compliance with the 24-hour PM10 National Ambient Air Quality Standard.
- The federally enforceable provisions are not enforceable because of the failure to include operation limits.
- The federally enforceable provisions are not enforceable because of the failure to impose short-term emission limits.
- The combined PM10 emission limits for the WSACs and combustion turbines specified are not enforceable or not enforceable as a practical matter.
- Pinal County failed to require modeling of secondary impacts due to emissions of the PM2.5 precursors NOx and SO2.

A copy of the Petition can be downloaded [here](#).