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Installation of Reciprocal Internal Combustion Engines/Tucson, Arizona Generating Station: Sierra Club Petition to the U.S. EPA Environmental Appeals Board Challenging PSD Permit

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The Sierra Club filed a September 7th Petition for Review (“Petition”) of a Clean Air Act Prevention of Significant Deterioration Permit (“PSD Permit”) that was issued to the Tucson Electric Power Irvington/H.Wilson Sundt Generating Station (“Station”).

The Pima County Department of Environmental Quality (“PDEQ”) had issued a PSD Permit for 10 Reciprocating Internal Combustion Engine (“RICE”) units to be constructed at the Station located in Tucson, Arizona.

The Petition describes the PSD Permit as enabling:

. . . the construction and operation of ten natural gas-burning Reciprocating Internal Combustion Engine (“RICE”) units, each with a generating capacity of 19 MW. In conjunction with the required shutdown of two steam-turbine cycle electric generating units, the RICE project would increase the combined nominal net generating capacity of Irvington Generating Station from 470 MW to 498 MW.

The Sierra Club’s Petition argues that the PDEQ premised its issuance of the PSD Permit upon clearly erroneous interpretations of statutory PSD requirements and implementing regulations as well as upon clearly erroneous findings of facts. It argues that the PSD Permit fails to require adequate monitoring of NOx emissions. As a result, it is alleged that the Permit is not practicably enforceable as required by the Clean Air Act.

The organization argues that the Station’s PSD Permit, including Part B and P Specific Conditions II.A.1.a. and b., and II.D.1 and D.2, fails to include practicably enforceable conditions that ensure compliance with the NOx emissions cap.

The Petition requests that the Board grant review and remand the PSD Permit for the Station with instructions to PDEQ to either:

1. Include practicably enforceable conditions that ensure compliance with the NOx cap based upon contemporaneous and accurate monitoring and reporting of NOx emissions from the RICE units, or

2. Find the increase in NOx emissions from the RICE units amounts to a major modification of an existing source pursuant to PCC § 17.04.340(A)(212) and 40 C.F.R. § 52.21(b)(23), requiring full PSD review including an air quality dispersion modeling analysis and a BACT analysis.

A copy of the [Petition](#), excluding the exhibits, can be found here.