

Department of Environmental Quality

*To protect, conserve and enhance the quality of Wyoming's
environment for the benefit of current and future generations.*



Matthew H. Mead, Governor

Todd Parfitt, Director

July 5, 2013

Mr. William K. Lawson
Environmental Manager
PacifiCorp Energy
1407 W. North Temple, Suite 330
Salt Lake City, UT 84116

CERTIFIED -- RETURN RECEIPT REQUESTED

Re: Air Quality Permit No. MD-14506

Dear Mr. Lawson:

The Division of Air Quality of the Wyoming Department of Environmental Quality has completed final review of PacifiCorp Energy's application to modify the Naughton Power Plant by reducing permitted emissions from Unit 3 and ultimately converting the unit from a coal-fired electric generating unit to a natural gas-fired unit in 2018. The Naughton Plant is located in sections 32 and 33, T21N, R116W, approximately four (4) miles southwest of Kemmerer, in Lincoln County, Wyoming. Comments were received from PacifiCorp Energy on June 14, 2013; and on June 17, 2013 from the United Mine Workers of America Local 1307; from Westmoreland Kemmerer, Incorporated; and from the Lincoln Conservation District. All comments were considered in the final permit and are addressed below.

Comments from the United Mine Workers of America Local 1307; Westmoreland Kemmerer, Incorporated; and the Lincoln Conservation District

Comments: The United Mine Workers of America Local 1307 and Westmoreland Kemmerer, Incorporated oppose the permitting action that would allow the conversion of Naughton Unit 3 to a natural gas-fired unit. Both commenters state that controls could be used on the existing unit to achieve compliance with EPA standards. Both commenters also cite the potential reduction in the workforce at the Kemmerer Mine, reduction in tax revenue, and a potential loss of school district funding as the reasons for their opposition. The Lincoln Conservation District commented that the price of natural gas could rise in the future, which could increase rates for electricity from gas-fired units. They also cite the potential loss of tax revenue and impact to local budget cuts, and concur that pollution controls could be used on the existing coal-fired unit to achieve compliance with EPA standards.

Responses: The Division grants air quality permits for the construction or modification of air pollution sources based on compliance with the Wyoming Air Quality Standards and Regulations. The Division does not dictate fundamental design of the applicant's facility or the applicant's choice of fuels or the cost of those fuels. We do not have the authority to deny an air quality permit for a proposed project because of a project's impact on tax revenue or the local economy. We do consider the costs of the air pollution control equipment that is proposed for the facility, but only to ensure that Best Available Control Technology (BACT) is being applied in accordance with the WAQSR.



PacifiCorp Energy's Comments

- Comment: Permit Conditions 6.ii.4 and 10 – PacifiCorp stated that it intends to implement the requirements imposed by Condition 6.ii beginning April 1, 2015, and requests that Conditions 6.ii.4 and 10 be revised to require that initial performance testing be completed within 30 boiler operating days from April 1, 2015. PacifiCorp also notes that Condition 10 refers to limits contained in Condition 5.ii that are actually stated in 6.ii.
- Response: The Division will retain the effective date of the emission limits shown in 6.ii.4, but will revised the timeframe for initial performance testing from April 1, 2015 to within 30 boiler operating days from April 1, 2015 in accordance with Chapter 6, Section 2(j) of the Wyoming Air Quality Standards and Regulations (WAQSR). Condition 10 will be revised to correctly refer to the limits in Condition 6.ii rather than 5.ii.
- Comment: Permit Conditions 6.iii.4 and 11 – PacifiCorp intends to complete the conversion of Unit 3 and place the unit in service as a natural gas unit prior to June 30, 2018. Therefore, the requirement that initial performance testing for limits under 6.iii.4 be complete by December 31, 2017 cannot be met. PacifiCorp also notes that Condition 11 refers to limits contained in Condition 5.iii that are actually stated in 6.iii.
- Response: The Division's intent in requiring testing under Condition 6.iii.4 by December 31, 2017 was to ensure that Unit 3 would not be fueled by coal beyond that date, as represented in the application. To allow PacifiCorp the time needed to make the conversion of Unit 3 to a natural gas-fired unit, the Division will extend the initial performance testing requirement to 90 calendar days following startup of the unit on natural gas. The Division will require that the coal pulverizers for Unit 3 be removed from service no later than January 1, 2018, in accordance with PacifiCorp Energy's comment, to ensure that Unit 3 does not operate on coal during the conversion to a natural gas-fired unit. Condition 11 will be revised to correctly refer to the limits specified in Condition 6.iii rather than 5.iii.
- Comment: Permit Conditions 6.iii.2 and 11.i.2 - PacifiCorp requests that the 2-hour rolling average limit and the 3-hour block average limit for SO₂ be removed. PacifiCorp also requests that the requirement to determine SO₂ emissions using a continuous emissions monitoring system (CEMS) be replaced with a method using gas flow and an emissions factor from 40 CFR part 75.
- Response: The Division will not grant these requests without a demonstration on the part of the applicant that the remaining emissions limits for SO₂ will allow for the same level of air quality protection as the limits that are requested for removal. The SO₂ limits for Naughton Unit 3 will remain as proposed. If PacifiCorp Energy provides a demonstration to revise the SO₂ limits, then the Division will consider revising the applicable monitoring requirements based on the averaging period of the determined limits.
- Comment: Permit Conditions 13.i.1 and 13.i.3 - PacifiCorp requests that the 30-day and 12-month rolling average emission limits be based on the summation of hourly emissions divided by the summation of hourly heat input for the same time period.

Air Quality Permit MD-14506
Response to Comments
Page 3

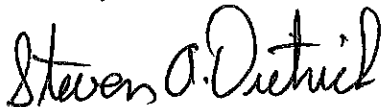
Response: The Division will retain the methods specified in Conditions 13.i.1 and 13.i.3 to define exceedances of the emission limits as they are consistent with existing methods specified in other air quality permits for the Naughton Plant. The Division does not anticipate that the requested methods would yield results appreciably different from those produced by the methods required in the draft permit.

Comment: Permit Condition 20 - PacifiCorp intends to complete the conversion of Unit 3 and place the unit in service as a natural gas unit prior to June 30, 2018, therefore they request that Condition 20 be modified to reflect that the conversion must be completed prior to June 30, 2018, and that initial performance tests be completed within 90 days of initial startup on natural gas.

Response: The Division's intent in requiring the conversion of Unit 3 and initial testing by December 31, 2017 was to ensure that Unit 3 would not be fueled by coal beyond that date, as represented in the application. To allow PacifiCorp the time needed to make the conversion of Unit 3 to a natural gas-fired unit, the Division will extend the initial performance testing requirement to 90 calendar days following the startup of the unit on natural gas. The Division will require that the coal pulverizers for Unit 3 be removed from service no later than January 1, 2018 to ensure that Unit 3 cannot operate on coal during the conversion to a natural gas-fired unit.

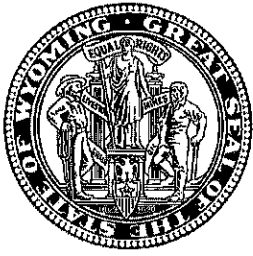
If we may be of further assistance to you, please feel free to contact this office.

Sincerely,



Steven A. Dietrich
Administrator
Air Quality Division

cc: Greg Meeker



Department of Environmental Quality

*To protect, conserve and enhance the quality of Wyoming's
environment for the benefit of current and future generations.*



Matthew H. Mead, Governor

Todd Parfitt, Director

July 5, 2013

Mr. William K. Lawson
Environmental Manager
PacifiCorp Energy
1407 W. North Temple, Suite 330
Salt Lake City, UT 84116

Permit No. MD-14506

Dear Mr. Lawson:

The Division of Air Quality of the Wyoming Department of Environmental Quality has completed final review of PacifiCorp Energy's application to modify the Naughton Power Plant by reducing permitted emissions from Unit 3 and ultimately converting the unit from a coal-fired electric generating unit to a natural gas-fired unit in 2018. The Naughton Plant is located in sections 32 and 33, T21N, R116W, approximately four (4) miles southwest of Kemmerer, in Lincoln County, Wyoming.

Following this agency's proposed approval of the request as published May 16, 2013 and in accordance with Chapter 6, Section 2(m) of the Wyoming Air Quality Standards and Regulations, the public was afforded a 30-day period in which to submit comments concerning the proposed modification, and an opportunity for a public hearing. Comments were received and considered in the issuance of the final permit. Therefore, on the basis of the information provided to us, approval to modify the Naughton Power Plant as described in the application is hereby granted pursuant to Chapter 6, Section 2 of the regulations with the following conditions:

1. That authorized representatives of the Division of Air Quality be given permission to enter and inspect any property, premise or place on or at which an air pollution source is located or is being constructed or installed for the purpose of investigating actual or potential sources of air pollution and for determining compliance or non-compliance with any rules, standards, permits or orders.
2. That all substantive commitments and descriptions set forth in the application for this permit, unless superseded by a specific condition of this permit, are incorporated herein by this reference and are enforceable as conditions of this permit.
3. PacifiCorp Energy shall file a complete application to modify their Operating Permit within twelve (12) months of commencing operation, in accordance with Chapter 6, Section 3(c)(i)(B) of the WAQSR.
4. All notifications, reports and correspondence associated with this permit shall be submitted to the Stationary Source Compliance Program Manager, Air Quality Division, 122 West 25th Street, Cheyenne, WY 82002 and a copy shall be submitted to the District Engineer, Air Quality Division, 510 Meadowview Drive, Lander, WY 82520.
5. For the conversion of Naughton Unit 3 to natural gas, the owner or operator shall furnish the Administrator written notification of: (i) the anticipated date of initial startup not more than 60 days or less than 30 days prior to such date, and; (ii) the actual date of initial start-up within 15 days after such date in accordance with Chapter 6, Section 2(i) of the WAQSR.



6. This condition shall supersede portions of Condition 5 of Air Quality Permit MD-11725 as it pertains to Naughton Unit 3. Condition 5, Unit 3, Condition i. of MD-11725 shall remain in effect. Emissions from Naughton Unit 3 shall not exceed the levels below:

Unit 3

- ii. Effective April 1, 2015:
1. NO_x: 0.75 lb/MMBtu; 3-hour rolling average
0.40 lb/MMBtu; 30-day rolling average
1,258.0 lb/hr; 30-day rolling average
4,700 tons per calendar year
 - a. Limits shall apply during all operating periods.
 2. SO₂: 0.5 lb/MMBtu; 2-hour rolling average
0.20 lb/MMBtu; 30-day rolling average
1,850 lb/hr; 3-hour block average
629.0 lb/hr; 30-day rolling average
2,350 tons per calendar year
 - a. Limits shall apply during all operating periods.
 3. PM: 0.035 lb/MMBtu
110.0 lb/hr
434.0 tons per calendar year
 - a. Filterable PM/PM₁₀
 - b. lb/hr limit shall apply during all operating periods.
 - c. lb/MMBtu shall apply during all operating periods, except startup.
 - i. Startup begins with the introduction of natural gas into the boiler and ends no later than the point in time when the ESP reaches a temperature of 225°F.
 4. Limits in (ii.) above supersede limits in MD-11725, Condition 5(i.) for Unit 3 on and after April 1, 2015. Initial performance tests required by Condition 10 of this permit shall be completed within 30 boiler operating days of April 1, 2015.
- iii. Effective upon conversion to natural gas:
1. NO_x: 0.75 lb/MMBtu; 3-hour rolling average
0.08 lb/MMBtu; 30-day rolling average
250.0 lb/hr; 30-day rolling average
519.0 tons per calendar year
 - a. Limits shall apply during all operating periods.
 2. SO₂: 0.5 lb/MMBtu; 2-hour rolling average
0.0006 lb/MMBtu; 30-day rolling average
1,850 lb/hr; 3-hour block average
2.0 lb/hr; 30-day rolling average
4.0 tons per calendar year
 - a. Limits shall apply during all operating periods.

3. PM: 0.008 lb/MMBtu
30.0 lb/hr
52.0 tons per calendar year
 - a. Total PM/PM₁₀
 - b. Limits shall apply during all operating periods.
 4. Limits in (iii.) above supersede limits in (ii.) of this condition for Unit 3 on and after January 1, 2018. Initial performance tests required by Condition 11 of this permit shall be completed within 90 calendar days of startup after conversion to natural gas.
-
7. Effective upon permit issuance, this condition shall supersede Condition 6(i) of Air Quality Permit MD-11725. Opacity shall be limited as follows:
 - i. Units 1-2:
 1. No greater than forty percent (40%) opacity of visible emissions.
 - a. Limit shall apply during all operating periods.
 - Unit 3:
 1. No greater than twenty percent (20%) opacity for visible emissions.
 - a. Limit shall apply during all operating periods.
 - b. Limit shall become effective upon startup of Unit 3 after natural gas conversion and completion of initial performance tests required by Condition 11 of this permit.
 8. Effective upon permit issuance, this condition shall supersede Condition 10 in MD-9861.
 - i. Authorization for SO₃ injection on Unit 3 shall remain in effect until start-up of Unit 3 after natural gas conversion and completion of the initial performance tests required by Condition 11 of this permit.
 9. Effective upon permit issuance, this condition shall supersede Condition 17 in MD-5156. PacifiCorp Energy shall not be required under MD-5156 to install, calibrate, operate, and maintain a PM continuous emissions monitoring system (CEMS) on Unit 3.
 10. Within 30 boiler operating days of April 1, 2015, performance tests shall be conducted on Unit 3 to demonstrate compliance with the limits in Condition 6.ii. and a written report of the results shall be submitted. If the maximum allowable heat input rate established in Condition 15 is not achieved during the performance tests, the Administrator may require testing be done at the rate achieved and again when the maximum allowable rate is achieved. Performance tests shall consist of the following:
 - i. Unit 3:
 1. NO_x Emissions – Compliance with the NO_x 3-hour and 30-day rolling averages shall be determined using a continuous emissions monitoring system (CEMS) certified in accordance with 40 CFR part 75.

2. SO₂ Emissions – Compliance with the SO₂ 2-hour and 30-day rolling averages and 3-hour block average shall be determined using a continuous emissions monitoring system (CEMS) certified in accordance with 40 CFR part 75.
3. PM/PM₁₀ Emissions – Testing shall follow EPA Reference Test Methods 1-4 and 5, or an equivalent EPA Reference Method.

Testing required by the Chapter 6, Section 3, Operating Permit or required by 40 CFR part 63, subpart UUUUU may be submitted to satisfy the testing required by this condition.

11. Effective upon permit issuance, the applicable requirements of this condition shall supersede Condition 11.ii.2.(Unit 3) of MD-5156. Within 90 calendar days of conversion of Unit 3 to natural gas performance tests shall be conducted on Unit 3 to demonstrate compliance with the limits in Condition 6.iii. of this permit and a written report of the results shall be submitted. If the maximum allowable heat input rate established in Condition 15 of this permit is not achieved during the performance tests, the Administrator may require testing be done at the rate achieved and again when the maximum allowable rate is achieved. Performance tests shall consist of the following:

i. Unit 3:

1. NO_x Emissions – Compliance with the NO_x 3-hour and 30-day rolling averages shall be determined using a continuous emissions monitoring system (CEMS) certified in accordance with 40 CFR part 75.
2. SO₂ Emissions – Compliance with the SO₂ 2-hour and 30-day rolling averages and 3-hour block average shall be determined using a continuous emissions monitoring system (CEMS) certified in accordance with 40 CFR part 75.
3. PM/PM₁₀ Emissions – Testing shall follow EPA Reference Test Methods 1-5 and 202, or an equivalent EPA Reference Method.
4. CO Emissions - Testing shall follow EPA Reference Test Methods 1-4 and 10 or an equivalent EPA Reference Method.

Testing required by the Chapter 6, Section 3, Operating Permit or required by 40 CFR part 63, subpart UUUUU may be submitted to satisfy the testing required by this condition.

12. Prior to any testing required by this permit, a test protocol shall be submitted to the Division for approval, at least 30 days prior to testing. Notification should be provided to the Division at least 15 days prior to any testing. Results of the tests shall be submitted to this office within 45 days of completing the tests.

13. This condition shall supersede Condition 8 of Air Quality Permit MD-11725 as it applies to Naughton Unit 3. Compliance with the NO_x and SO₂ limits for Naughton Unit 3 set forth in Condition 5(i.) of MD-11725 and Condition 5 of this permit shall be determined with data from the NO_x and SO₂ continuous monitoring systems required by 40 CFR Part 75 as follows:

i. Exceedances of the limits shall be defined as follows:

1. Any 12-month rolling average which exceeds the lb/MMBtu NO_x limits as calculated using the following formula:

$$E_{avg} = \frac{\sum_{h=1}^n (C)_h}{n}$$

Where:

E_{avg} = Weighted 12-month rolling average emission rate (lb/MMBtu).

C = 1-hour average SO₂ or NO_x emission rate (lb/MMBtu) for hour “h” calculated using valid data from the CEM equipment certified and operated in accordance with Part 75 and the procedures in 40 CFR part 60, appendix A, Method 19. Valid data shall meet the requirements of WAQSR, Chapter 5, Section 2(j). Valid data shall not include data substituted using the missing data procedure in subpart D of Part 75, nor shall the data have been bias adjusted according to the procedures of Part 75.

n = The number of unit operating hours monitored during a boiler operating day in the last twelve (12) successive calendar months with valid emissions data meeting the requirements of WAQSR, Chapter 5, Section 2(j). A “boiler operating day” shall be defined as any 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time at the steam generating unit.

2. Any 12-month rolling average which exceeds the lb/hr NO_x limit as calculated using the following formula:

$$E_{avg} = \frac{\sum_{h=1}^n (C)_h}{n}$$

Where:

E_{avg} = Weighted 12-month rolling average emission rate (lb/hr).

C = 1-hour average emission rate (lb/hr) for hour “h” calculated using valid data (output concentration and average hourly volumetric flowrate) from the CEM equipment certified and operated in accordance with Part 75. Valid data shall meet the requirements of WAQSR, Chapter 5, Section 2(j). Valid data shall not include data substituted using the missing data procedure in subpart D of Part 75, nor shall the data have been bias adjusted according to the procedures of Part 75.

n = The number of unit operating hours monitored during a boiler operating day in the last twelve (12) successive calendar months with valid emissions data meeting the requirements of WAQSR, Chapter 5, Section 2(j). A “boiler operating day” shall be defined as any 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time at the steam generating unit.

3. Any 30-day rolling average which exceeds the lb/MMBtu SO₂ or NO_x limit as calculated using the following formula:

$$E_{avg} = \frac{\sum_{h=1}^n (C)_h}{n}$$

Where:

E_{avg} = Weighted 30-day rolling average emission rate (lb/MMBtu).

C = 1-hour average emission rate (lb/MMBtu) for hour “h” calculated using valid data from the CEM equipment certified and operated in accordance with Part 75 and the procedures in 40 CFR part 60, appendix A, Method 19. Valid data shall meet the requirements of WAQSR, Chapter 5, Section 2(j). Valid data shall not include data substituted using the missing data procedure in subpart D of Part 75, nor shall the data have been bias adjusted according to the procedures of Part 75.

n = The number of unit operating hours in the last thirty (30) successive boiler operating days with valid emissions data meeting the requirements of WAQSR, Chapter 5, Section 2(j). A “boiler operating day” shall be defined as any 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time at the steam generating unit.

4. Any 30-day rolling average which exceeds the lb/hr SO₂ or NO_x limits as calculated using the following formula:

$$E_{avg} = \frac{\sum_{h=1}^n (C)_h}{n}$$

Where:

E_{avg} = Weighted 30-day rolling average emission rate (lb/hr).

C = 1-hour average emission rate (lb/hr) for hour "h" calculated using valid data (output concentration and average hourly volumetric flowrate) from the CEM equipment certified and operated in accordance with Part 75. Valid data shall meet the requirements of WAQSR, Chapter 5, Section 2(j). Valid data shall not include data substituted using the missing data procedure in subpart D of Part 75, nor shall the data have been bias adjusted according to the procedures of Part 75.

n = The number of unit operating hours in the last thirty (30) successive boiler operating days with valid emissions data meeting the requirements of WAQSR, Chapter 5, Section 2(j). A "boiler operating day" shall be defined as any 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time at the steam generating unit.

5. Any 3-hour rolling average of NO_x emissions calculated using data from the CEM equipment required by 40 CFR part 75 which exceeds the lb/MMBtu limit established in this permit using valid data. Valid data shall meet the requirements of WAQSR, Chapter 5, Section 2(j). The 3-hour average emission rate shall be calculated as the arithmetic average of the previous three (3) operating hours.
6. Any 2-hour rolling average of SO₂ emissions calculated using data from the CEM equipment required by 40 CFR part 75 which exceeds the lb/MMBtu limit established in this permit using valid data. Valid data shall meet the requirements of WAQSR, Chapter 5, Section 2(j). The 2-hour average emission rate shall be calculated as the arithmetic average of the previous two (2) operating hours.

7. Any 3-hour block average of SO₂ emissions calculated using data from the CEM equipment required by 40 CFR part 75 which exceeds the lb/hr limit established in this permit using valid data. Valid data shall meet the requirements of WAQSR, Chapter 5, Section 2(j). The 3-hour average emission rate shall be calculated at the end of each 3-hour operating block as the arithmetic average of hourly emissions with valid data during the previous three (3) operating hours.
 - ii. PacifiCorp will comply with all reporting and record keeping requirements as specified in WAQSR, Chapter 5, Section 2(g).
 - iii. Exclusion of startup, shutdown, and malfunction emissions only applies to federal standard(s) as authorized in the respective subpart and as authorized in this permit.
14. Effective April 1, 2015, Naughton Unit 3's hourly heat input shall be limited to 3,145 MMBtu/hr, based on a 24-hour block average defined as any 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time at the steam generating unit. Compliance with the heat input limit will be determined using a 40 CFR Part 75 certified CEMS and the procedures for determining heat input per 40 CFR Part 75.
 15. Effective January 1, 2018, Naughton Unit 3's heat input shall be limited to 12,964,800 MMBtu based on 12-month rolling average of hourly heat input values. Compliance with the heat input limited will be determined using a 40 CFR Part 75 certified CEMS and the procedures for determining heat input per 40 CFR Part 75.
 16. Effective upon permit issuance, this condition shall supersede Condition 5.ii of Air Quality Permit MD-11754.
 - ii. PAL limits effective upon completion of initial performance tests required by Condition 11.
 1. NO_x: 5,402.4 tons per year
 - a. Limit is based on a 12-month rolling total.
 - b. Initial compliance shall be determined 12 months after the effective date of the PAL. The effective date is the first day of the next month following completion of the initial performance tests required after the completion of natural gas conversion and startup of Unit 3. PacifiCorp Energy shall continue to demonstrate compliance with the NO_x PAL of 11,112.8 tons per year until the initial compliance date for the modified NO_x PAL is triggered.

2. SO₂: 2,862.2 tons per year
 - a. Limit is based on a 12-month rolling total.
 - b. Initial compliance shall be determined 12 months after the effective date of the PAL. The effective date is the first day of the next month following completion of the initial performance tests required after the completion of natural gas conversion and startup of Unit 3 and. PacifiCorp Energy shall continue to demonstrate compliance with the SO₂ PAL of 8,789.8 tons per year until the initial compliance date for the modified SO₂ PAL is triggered.
-
17. Unit 3 shall be equipped with in-stack continuous emission monitoring (CEM) equipment to monitor CO emissions:
 - i. CO CEM shall be installed and certified within ninety (90) days of permit issuance.
 - ii. PacifiCorp Energy shall install, calibrate, operate, and maintain a monitoring system, and record the output, for measuring CO emissions discharged to the atmosphere in units of ppm_v, lb/MMBtu, and lb/hr. The CO monitoring system shall consist of the following:
 1. A continuous emission CO monitor located in the stack of Unit 3.
 2. A continuous flow monitoring system for measuring the flow of exhaust gases discharged into the atmosphere.
 3. An in-stack oxygen or carbon dioxide monitor for measuring oxygen or carbon dioxide content of the flue gas at the location CO emissions are monitored.
 - iii. Each continuous monitor system listed in this condition shall comply with the following:
 1. Monitoring requirements of WAQSR, Chapter 5, Section 2(j) including the following:
 - a. 40 CFR part 60, appendix B, Performance Specification 4 or 4a for carbon monoxide. The monitoring systems must demonstrate linearity using 40 CFR part 60, appendix F, and be certified in concentration (ppm_v) and units of lb/MMBtu and lb/hr.
 - b. Quality Assurance requirements of 40 CFR part 60, appendix F.
 - c. PacifiCorp Energy shall develop and submit for the Division's approval a Quality Assurance plan for each monitoring system listed in this condition. Quality Assurance plans shall be submitted within 180 days from startup of each unit after new low NO_x burners have been installed.
 - iv. The CO monitor may be removed after December 31, 2017, upon Division approval.

18. Annually, as otherwise specified by the Administrator, Unit 3 shall be tested to verify compliance with the PM limits set forth in Condition 6. The first annual test is required the following calendar year after completion of the initial performance test required by Condition 10. Testing for PM shall be conducted in accordance with EPA Reference Methods 1-5 and 202, or an equivalent EPA Reference Method. A test protocol shall be submitted to this office for review and approval prior to testing. Notification of the test date shall be provided to the Division fifteen (15) days prior to testing. Results of the tests shall be submitted to the Division within forty-five (45) days of completing the tests.
19. Records required by this permit shall be maintained for a period of at least five (5) years and shall be made available to the Division upon request.
20. PacifiCorp Energy shall remove the coal pulverizers on Unit 3 from service no later than January 1, 2018. PacifiCorp Energy shall provide written notification to the Division of the actual date of pulverizer removal within 30 days of such date.
21. PacifiCorp Energy shall complete the conversion of Naughton Unit 3 to natural gas prior to June 30, 2018, and conduct the initial performance tests required in Condition 11 of this permit no later than 90 calendar days after initial startup of Unit 3 after natural gas conversion.
22. This condition shall become effective upon start-up of Naughton Unit 3 after conversion to natural gas, as reported in accordance with Condition 5 of this permit, and shall supersede Air Quality Permit MD-11894 for the Naughton Plant.
23. All conditions from previously issued Air Quality Permits MD-5156, MD-9861, and MD-11725 shall remain in effect unless specifically superseded by a condition of this permit.

It must be noted that this approval does not relieve you of your obligation to comply with all applicable county, state, and federal standards, regulations or ordinances. Special attention must be given to Chapter 6, Section 2 of the Wyoming Air Quality Standards and Regulations, which details the requirements for compliance with Conditions 5, 10 and 11. Attention must be given to Chapter 6, Section 3 of the Wyoming Air Quality Standards and Regulations, which details the requirements for compliance with Condition 3. Any appeal of this permit as a final action of the Department must be made to the Environmental Quality Council within sixty (60) days of permit issuance per Section 16, Chapter I, General Rules of Practice and Procedure, Department of Environmental Quality.

If we may be of further assistance to you, please feel free to contact this office.

Sincerely,



Steven A. Dietrich
Administrator
Air Quality Division



Todd Parfitt
Director
Dept. of Environmental Quality

cc: Greg Meeker