Saved attachment to partial release folder and deleted from here

From: Lee, Anita
To: Keating, Martha; Lorang, Phil; Jones, Rhea; Hawes, Todd
Cc: Lyons, Ann; McKaughan, Colleen
Subject: RE: OAQPS review of NGS supplemental proposal
Date: Friday, August 16, 2013 1:56:42 PM
Attachments: 2013_0813 Update Briefing.pdf

Thanks Martha,

Ann has been in touch with Matt and Sara about this.

I'm attaching the briefing materials that we prepared for our RA.

Page 1 deals with all of the non-BART commitments in the TWG Agreement, page 2 is a summary of the TWG Alternative in outline form, page 3 is a flow diagram from TWG that shows how future ownership relates to operating scenarios, page 4 is a table that we generated and will use in our FRN to explain the Alternative and our analysis to determine whether the operating scenarios can reasonably be expected to result in emissions below the emissions cap, and pages 5-7 are graphs that will be included in the docket and referenced in the FRN.

Please let me know if you have any questions, and thanks again!

Anita Lee, PhD
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San Francisco, CA 94105
(415) 972-3958

-----Original Message-----
From: Keating, Martha
Sent: Friday, August 16, 2013 1:12 PM
To: Lee, Anita; Lorang, Phil; Jones, Rhea; Hawes, Todd
Cc: Lyons, Ann; McKaughan, Colleen
Subject: RE: OAQPS review of NGS supplemental proposal

Fine with me but I do know that Matt will be out of the office and unavailable to review the notice. Suggest you flag this for Sara.

Do you have a summary of the alternative?

Thanks
Martha

From: Lee, Anita
Sent: Friday, August 16, 2013 4:02 PM
To: Lorang, Phil; Jones, Rhea; Hawes, Todd; Keating, Martha
Cc: Lyons, Ann; McKaughan, Colleen
Subject: OAQPS review of NGS supplemental proposal

Hi Phil, Rhea, Todd and Martha,

I know that you are all aware that R9 received an Alternative to BART for Navajo Generating Station on July 26

from a group of stakeholders, called the "Technical Work Group", consisting of the facility owners, DOI, Arizona water interests, EDF, Western Resource Advocates, Navajo Nation, and Gila River Indian Community.

We have been working on our analysis of the alternative and a Supplemental Proposal to take comment on this alternative. [redacted]

Our goal is to get a draft Supplemental Notice to you guys (and OGC – Matt Marks or Sara and Tod Siegel) mid-week next week, with the goal of getting a revised draft to Janet during the week of Aug 26 (so we would be requesting a quick review from you all). Our goal is to have our RA sign the proposal no later than Sept 9, giving us time to get it published in the FR with 30-day advance notice for public hearings that we would like to hold October 22-25.

The notice is fairly short, but the Alternative itself is a bit complicated to explain. We would be setting a cap in NOx emissions over 2009-2044. Various permutations of future ownership scenarios would define which of the 4 operating scenarios would be triggered to ensure that NGS maintains emissions below the cap. The cap is calculated based on our proposed BART limit of 0.055 lb/MMBtu achieved within 5 years of the final rule. [redacted]

Please let me know if this sounds do-able for your guys and your schedules, and if there is anything you would like me to do in the mean time (would a meeting to discuss/brief you all be helpful?)

Thank you, and my apologies for the short notice.
Anita

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