From:	McKaughan, Colleen
To:	Vickie Patton
Subject:	Re: EDF, WRA Comments on Navajo Generating Station Regional Haze Requirements, Docket No. EPA-R09-OAR-2013-0009
Date:	Tuesday, January 07, 2014 7:08:45 AM

Thanks, Vickie, and best wishes to you and your family for 2014!

From: Vickie Patton <vpatton@edf.org>
Sent: Monday, January 06, 2014 11:28:25 PM
To: McKaughan, Colleen
Cc: Bruce Polkowsky (bvpolk@gmail.com)
Subject: FW: EDF, WRA Comments on Navajo Generating Station Regional Haze Requirements, Docket No. EPA-R09-OAR-2013-0009

Hi Colleen – FYI.

Best wishes for a joyful new year,
Vickie

From: Vickie Patton
Sent: Monday, January 06, 2014 11:24 PM
To: 'r9ngsbart@epa.gov'; 'lee.anita@epa.gov'; 'lyons.ann@epa.gov'
Cc: Bruce Polkowsky (bvpolk@gmail.com); jnielsen@westernresources.org; Steve Michel WRA (smichel@westernresources.org)
Subject: EDF, WRA Comments on Navajo Generating Station Regional Haze Requirements, Docket No. EPA-R09-OAR-2013-0009

Transmitted Via Email

Anita Lee (Air-2)
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105-3901

Email: r9ngsbart@epa.gov; lee.anita@epa.gov; lyons.ann@epa.gov

RE: Comments on EPA's "Approval of Air Quality Implementation Plans; Navajo Nation; Regional Haze Requirements for Navajo Generating Station," Proposed Rule, 78 Fed. Reg. 8274 (Feb. 5, 2013) and Supplemental Proposal, 78 Fed. Reg. 62,509 (Oct. 22, 2013); Docket No. EPA-R09-OAR-2013-0009

Dear Ms. Lee:

Environmental Defense Fund (EDF) and Western Resource Advocates (WRA) respectfully submit the following, attached, comments on the above-referenced matter. All documents cited to are hereby incorporated by reference as part of the administrative docket for this rulemaking action.

The Navajo Generating Station (NGS) is a 2,250 megawatt three unit coal-fired power plant located on Navajo Nation lands near Page, Arizona. It is an extensive emitter of oxides of nitrogen, carbon dioxide and other airborne contaminants. The plant can discharge more than 25,000 tons per year (tpy) of oxides of nitrogen (NOx),[1] making it one of the single largest emitters of NOx in the western United States and the nation.

These emissions pollute the grand vistas of the West's and the nation's treasured national parks including the Grand Canyon National Park and other premier class I areas; these areas are accorded heightened air quality protection under the nation's clean air laws. Grand Canyon National Park in Arizona, Mesa Verde National Park in Colorado, and Arches, Bryce Canyon, Canyonlands, Capitol Reef, and Zion National Parks in Utah are among the 11 class I areas within approximately 300 km of NGS and that are adversely impacted by its emissions.

Our comments below address EPA's statutory responsibilities to protect air quality in class I national parks and wilderness areas, the well-established determination that modern emissions standards for NOx based on Selective Catalytic Reduction technology represent Best Available Retrofit Technology (BART) at the Navajo Generation Station, the importance of addressing long-standing concerns about air and water related health impacts associated with the Navajo Generating Station and Kayenta-Black Mesa Mining complex, and the request that EPA include all major elements of the Technical Working Group recommendations in the preamble of its final rulemaking notice. We support those recommendations, in their totality, as a reasonable alternative to BART.

Thank you for your consideration of our views.

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[1] US EPA Clean Air Markets Data, 2009.

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