Dave Heineman
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STATE OF NEBRASKA

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February 2, 2007

Patricia Hurd
Koch Nitrogen Company (NDEQ Facility #: 23383)
21178 Southwest 89th Road
Beatrice, NE 68310-6772

Re: Subject to Best Available Retrofit Technology (BART) Determination

Dear Ms. Hurd:

The Nebraska Department of Environmental Quality (NDEQ) has reviewed the BART modeling analysis and report for Koch Nitrogen Company submitted to the Department in June 2006. It has been determined that the modeling submitted was performed in accordance with the methodologies that the Department finds appropriate for this type of analysis.

Federal law requires BART to be applied to any BART-eligible source that "emits any air pollutant which may reasonably be anticipated to cause or contribute to any impairment of visibility" in any mandatory Class I federal area. Pursuant to federal regulations, states have the option of exempting a BART-eligible source from the BART requirements based on dispersion modeling demonstrating that the source cannot reasonably be anticipated to cause or contribute to visibility impairment in a Class I area. According to 40 CFR Part 51, Appendix Y, a BART-eligible source is considered to "contribute" to visibility impairment in a Class I area if the modeled 98th percentile change in deciview is equal to or greater than the "contribution threshold," which has been set to be 0.5 deciviews. The BART modeling analysis submitted by Koch, and reviewed by the Department, indicates that impacts from the source will never equal or exceed the contribution threshold. Koch Nitrogen Company is therefore not subject to BART.

If you have questions on this determination you may contact me directly at 402-471-8414 or via email at william.adler@ndeq.state.ne.us.

Sincerely,

William T. Adler

William T. Adler, Program Specialist
Air Quality Permitting Section, Air Quality Division
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**Bruce Polkowsky**, National Park Service
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**Robert Fenamore**, US EPA Region 7
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Kansas City, KS 66101

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June 4, 2007

Roger Behrns
Ash Grove Cement Company (NDEQ Facility #: 4129)
16215 Highway 50
Louisville, Nebraska 68037

Re: Subject to Best Available Retrofit Technology (BART) Determination

Dear Mr. Behrns:

The Nebraska Department of Environmental Quality (NDEQ) has reviewed the BART modeling analysis and report for Ash Grove submitted to the Department in November 2006. It has been determined that the modeling submitted was performed in accordance with the methodologies that the Department finds appropriate for this type of analysis.

Federal law requires BART to be applied to any BART-eligible source that "emits any air pollutant which may reasonably be anticipated to cause or contribute to any impairment of visibility" in any mandatory Class I federal area. Pursuant to federal regulations, states have the option of exempting a BART-eligible source from the BART requirements based on dispersion modeling demonstrating that the source cannot reasonably be anticipated to cause or contribute to visibility impairment in a Class I area. According to 40 CFR Part 51, Appendix Y, a BART-eligible source is considered to "contribute" to visibility impairment in a Class I area if the modeled 98$^{th}$ percentile change in deciview is equal to or greater than the "contribution threshold," which has been set to be 0.5 deciviews. The BART modeling analysis submitted by Ash Grove, and reviewed by the Department, indicates that impacts from the BART eligible units at the source will never equal or exceed the contribution threshold. Ash Grove is therefore not subject to BART.

If you have questions on this determination you may contact Greta Bluml at 402-471-2925 or via email at greta.bluml@ndeq.state.ne.us.

Sincerely,

Shelley Kaderly

Shelley Kaderly, Air Division Administrator
Nebraska Department of Environmental Quality
402-471-4299
shelley.kaderly@ndeq.state.ne.us

2007003227

c: Chuck Sams, Forest Service
Tim Allen, Fish and Wildlife Service
Bruce Polkowsky, National Park Service
Robert Fenamore, EPA Region 7

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Dave Heineman
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August 8, 2007

Bill Neal
Omaha Public Power District (OPPD)
444 South 16th Street Mall
Omaha, Nebraska 68102-2247

RE: FID # 59763 - Best Available Retrofit Technology (BART) Determination

Dear Mr. Neal:

The Nebraska Department of Environmental Quality (NDEQ) has reviewed the BART modeling analysis submitted by OPPD for the North Omaha Station in November 2006. It has been determined that the modeling analysis submitted was performed in accordance with the protocol approved by the Department.

Federal law requires BART control technology to be applied to any BART-eligible source that "emits any air pollutant which may reasonably be anticipated to cause or contribute to any impairment of visibility" in any mandatory Class I federal area. Pursuant to federal regulations, states have the option of exempting a BART-eligible source from the BART requirements based on dispersion modeling, demonstrating that the source cannot reasonably be anticipated to cause or contribute to visibility impairment in a Class I area. According to 40 CFR Part 51, Appendix Y, a BART-eligible source is considered to "contribute to" visibility impairment in a Class I area if the modeled 98$^{th}$ percentile change in deciview is equal to or greater than the "contribution threshold," which has been set to be 0.5 deciviews. Appendix Y also states that CALPUFF is "the best regulatory modeling application currently available for predicting a single source's contribution to visibility impairment and is currently the only EPA-approved model for use in estimating single source pollutant concentrations resulting from the long-range transport of primary pollutants."

For North Omaha, more than one analysis was conducted. The BART modeling analysis submitted by OPPD, and reviewed by the Department, utilized CALPUFF. This modeling analysis, for the Class I areas modeled, demonstrated that the North Omaha Station Units 4 and 5 do not cause or contribute to visibility impairment, and therefore are not subject to BART. A subsequent modeling analysis was performed by others which included four additional Class I areas, not previously evaluated. This modeling analysis yielded somewhat different results, but was performed using a different model, CAMx. For the four additional Class I areas analyzed the OPPD North Omaha Station Units 4 and 5, the 98$^{th}$ percentile values were below 0.5

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deciviews. This additional modeling further confirmed our determination that the North Omaha station Units 4 and 5 are not subject to BART.

If you have questions about this determination, you may contact me at 402-471-4299 or via email at shelley.kaderly@ndeq.state.ne.us.

Sincerely,

Shelley Kaderly
Air Quality Division Administrator

CC: Chuck Sams, Forest Service
Tim Allen, Fish and Wildlife Service
Bruce Polkowsky, National Park Service
Robert Fenamore, EPA Region 7
Chester Black, Omaha Air Quality Control

G

# STATE OF NEBRASKA

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February 2, 2007

Marty Stange
North Denver Station (NDEQ Facility #: 55721)
1228 N. Denver Ave.
Hastings, NE 68901-3078

Re: Subject to Best Available Retrofit Technology (BART) Determination

Dear Mr. Stange:

The Nebraska Department of Environmental Quality (NDEQ) has reviewed the BART modeling analysis and report for North Denver Station submitted to the Department in November 2006. It has been determined that the modeling submitted was performed in accordance with the methodologies that the Department finds appropriate for this type of analysis.

Federal law requires BART to be applied to any BART-eligible source that "emits any air pollutant which may reasonably be anticipated to cause or contribute to any impairment of visibility" in any mandatory Class I federal area. Pursuant to federal regulations, states have the option of exempting a BART-eligible source from the BART requirements based on dispersion modeling demonstrating that the source cannot reasonably be anticipated to cause or contribute to visibility impairment in a Class I area. According to 40 CFR Part 51, Appendix Y, a BART-eligible source is considered to "contribute" to visibility impairment in a Class I area if the modeled 98$^{th}$ percentile change in deciview is equal to or greater than the "contribution threshold," which has been set to be 0.5 deciviews. The BART modeling analysis submitted by North Denver, and reviewed by the Department, indicates that impacts from the source will never equal or exceed the contribution threshold. North Denver Station is therefore not subject to BART.

If you have questions on this determination you may contact me directly at 402-471-8414 or via email at william.adler@ndeq.state.ne.us.

Sincerely,

William T. Adler

William T. Adler, Program Specialist
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402-471-8414
william.adler@ndeq.state.ne.us

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c: Chuck Sams, Forest Service
Tim Allen, Fish and Wildlife Service
Bruce Polkowsky, National Park Service
Robert Fenamore, EPA Region 7

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**Tim Allen**, Fish and Wildlife Service
United States Department of the Interior
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**Bruce Polkowsky**, National Park Service
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February 2, 2007

Emily Wise
CW Burdick Generating Station (NDEQ Facility #: 54712)
P.O. Box 1968
Grand Island, NE 68801

Re: Subject to Best Available Retrofit Technology (BART) Determination

Dear Ms. Wise:

The Nebraska Department of Environmental Quality (NDEQ) has reviewed the BART modeling analysis and report for CW Burdick Generating Station submitted to the Department in November 2006. It has been determined that the modeling submitted was performed in accordance with the methodologies that the Department finds appropriate for this type of analysis.

Federal law requires BART to be applied to any BART-eligible source that "emits any air pollutant which may reasonably be anticipated to cause or contribute to any impairment of visibility" in any mandatory Class I federal area. Pursuant to federal regulations, states have the option of exempting a BART-eligible source from the BART requirements based on dispersion modeling demonstrating that the source cannot reasonably be anticipated to cause or contribute to visibility impairment in a Class I area. According to 40 CFR Part 51, Appendix Y, a BART-eligible source is considered to "contribute" to visibility impairment in a Class I area if the modeled 98$^{th}$ percentile change in deciview is equal to or greater than the "contribution threshold," which has been set to be 0.5 deciviews. The BART modeling analysis submitted by CW Burdick, and reviewed by the Department, indicates that impacts from the source will never equal or exceed the contribution threshold. CW Burdick Generating Station is therefore not subject to BART.

If you have questions on this determination you may contact me directly at 402-471-8414 or via email at william.adler@ndeq.state.ne.us.

Sincerely,

William T. Adler

William T. Adler, Program Specialist
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Robert Fenamore, EPA Region 7

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June 4, 2007

Joseph Citta
Nebraska Public Power District - Sheldon Station (NDEQ Facility #: 33563)
1414 15th St.
Columbus, NE 68601

Re: Subject to Best Available Retrofit Technology (BART) Determination

Dear Mr. Citta:

The Nebraska Department of Environmental Quality (NDEQ) has reviewed the BART modeling analysis and report for NPPD Sheldon Station submitted to the Department in November 2006. It has been determined that the modeling submitted was performed in accordance with the methodologies that the Department finds appropriate for this type of analysis.

Federal law requires BART to be applied to any BART-eligible source that "emits any air pollutant which may reasonably be anticipated to cause or contribute to any impairment of visibility" in any mandatory Class I federal area. Pursuant to federal regulations, states have the option of exempting a BART-eligible source from the BART requirements based on dispersion modeling demonstrating that the source cannot reasonably be anticipated to cause or contribute to visibility impairment in a Class I area. According to 40 CFR Part 51, Appendix Y, a BART-eligible source is considered to "contribute" to visibility impairment in a Class I area if the modeled 98th percentile change in deciview is equal to or greater than the "contribution threshold," which has been set to be 0.5 deciviews. The BART modeling analysis submitted by NPPD Sheldon Station, and reviewed by the Department, indicates that impacts from the BART eligible units at the source will never equal or exceed the contribution threshold. NPPD Sheldon Station is therefore not subject to BART.

If you have questions on this determination you may contact Greta Bluml at 402-471-2925 or via email at greta.bluml@ndeq.state.ne.us.

Sincerely,

Shelley Kaderly

Shelley Kaderly, Air Division Administrator
Nebraska Department of Environmental Quality
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shelley.kaderly@ndeq.state.ne.us

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c: Chuck Sams, Forest Service
Tim Allen, Fish and Wildlife Service
Bruce Polkowsky, National Park Service
Robert Fenamore, EPA Region 7
Rick Thorson, Lincoln Lancaster County Health Department

Dave Heineman
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June 6, 2007

Bob Realph
Lon D. Wright (NDEQ Facility #: 48518)
P.O. Box 1468
Fremont, Nebraska 68026-1468

Re: Subject to Best Available Retrofit Technology (BART) Determination

Dear Mr. Realph:

The Nebraska Department of Environmental Quality (NDEQ) has conducted BART modeling analysis for Lon D. Wright.

Federal law requires BART to be applied to any BART-eligible source that "emits any air pollutant which may reasonably be anticipated to cause or contribute to any impairment of visibility" in any mandatory Class I federal area. Pursuant to federal regulations, states have the option of exempting a BART-eligible source from the BART requirements based on dispersion modeling demonstrating that the source cannot reasonably be anticipated to cause or contribute to visibility impairment in a Class I area. According to 40 CFR Part 51, Appendix Y, a BART-eligible source is considered to "contribute" to visibility impairment in a Class I area if the modeled 98$^{th}$ percentile change in deciview is equal to or greater than the "contribution threshold," which has been set to be 0.5 deciviews. The BART modeling analysis conducted for Lon D. Wright indicates that impacts from the BART eligible units at the source will never equal or exceed the contribution threshold. Lon D. Wright is therefore not subject to BART.

If you have questions on this determination you may contact Greta Bluml at 402-471-2925 or via email at greta.bluml@ndeq.state.ne.us.

Sincerely,

Shelley Kaderly, Air Division Administrator
Nebraska Department of Environmental Quality
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c: Chuck Sams, Forest Service
Tim Allen, Fish and Wildlife Service
Bruce Polkowsky, National Park Service

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