

From: Rogers, Tim [mailto:Tim.Rogers@blackhillscorp.com]
Sent: Monday, June 22, 2009 3:09 PM
To: Boddicker, Rick
Cc: Carl, Fred; Riner, Steve
Subject: Regional Haze: 4-factor analysis on selected sources in South Dakota

Rick, You have asked for comments on the 4-factor analysis on selected sources in South Dakota conducted by the WRAP.

Here are some comments:

1. Stakeholder Participation: This particular project caught us by surprise. Typically, we been invited to participate as a stakeholder in all of the Regional Haze planning processes, but I don't recall being invited to participate in this one.
2. Adequate Time to Review: As with any government agency or other industry, we have a limited amount time and resources to work on projects. This exercise was basically a PSD BACT review on the control technologies. We have not had time to review and verify the numbers and the resources used to put these numbers together.
3. Selection of Sources: Why were there only two sources selected for review in South Dakota for this process? What was the methodology used to select sources?
4. Source Control Impacts/Evaluation: Did the WRAP conduct Calpuff modeling to determine improvements with the project controls being evaluated prior to conducting this exercise to determine if this exercise would provide desired results in reducing Regional Haze at impacted Class I areas?

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