



NORTH DAKOTA
DEPARTMENT of HEALTH

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December 21, 2009

Ms. Callie Videtich (AP-AR)
Director, Air Programs
U.S. EPA, Region 8
1595 Wynkoop Street
Denver, CO 80202-1129

Re: MDU Heskett Station Unit 2
BART Applicability

Dear Ms. Videtich: *Callie*

On October 23, 2009, your staff provided comments on the draft North Dakota Regional Haze State Implementation Plan (SIP) revision. One of the comments concerned the exemption of Montana Dakota Utilities (MDU) Heskett Station Unit 2 from the BART requirements. EPA expressed concerns regarding the MDU modeling methodology, and requested that MDU remodel for BART applicability based on the latest EPA preferred model settings.

A conference call was held on November 17, 2009 with MDU, AECOM - MDU's consultant, EPA Region 8 representatives, FLM representatives and the Department to discuss the concerns. During the call, MDU agreed to remodel Heskett Unit 2 to determine BART applicability using preferred model settings identified by EPA and the FLMs. Although the Department does not necessarily agree with all of EPA's proposed model settings nor do we agree with treatment of combining the three units of TRNP as suggested by the FLMs, we did agree to allow the modeling to proceed in an effort to bring closure in addressing EPA's concerns and to meet the tight time constraints for submitting the State's RH SIP.

MDU has remodeled using the latest EPA preferred model settings and the FLMs treatment of Theodore Roosevelt National Park. The Department has reviewed MDU's updated analysis (attached) and has confirmed the modeling results. Based on the results of MDU's previous analysis and the updated analysis requested by EPA, the Department concludes MDU Heskett Station Unit 2 to be exempt from the BART requirements.

If you have any questions, please feel free to contact us.

Sincerely,

Terry L. O'Clair, P.E.
Director
Division of Air Quality

TLO/TB:saj

Enc:

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