EXHIBIT B

Attached to Conservation Groups'
May 27, 2011 Public Comment Letter
Submitted in EIB 11-01 (R) and EIB 11-02 (R)

STATE OF COLORADO

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April 4, 2011

Mr. Guy Donaldson (6PD-L)
U.S. Environmental Protection Agency - Region 6
1445 Ross Avenue, STE 1200
Dallas, TX 75202-2733.

Docket Number EPA–R06–OAR–2010–0846

RE: State of Colorado's Comments on EPA's Approval and Promulgation of Implementation Plans; New Mexico; Federal Implementation Plan for Interstate Transport of Pollution Affecting Visibility and Best Available Retrofit Technology (BART) Determination for the San Juan Generating Station (Federal Register Volume 76, No. 3, pages 491-507)

Dear Mr. Donaldson,

The State of Colorado appreciates the opportunity to comment on EPA's January 5, 2011 proposed rulemaking concerning EPA's proposed BART determination for the San Juan Generating Station (SJGS), a major electric generating facility located west of Farmington, New Mexico. We are mindful of the flexibility afforded under the EPA BART regulations and the discretion accorded the states in deciding appropriate emission controls, and under certain circumstances accorded to EPA. BART determinations first and foremost are the purview of the states. Colorado has no comment on the fact that it is EPA proposing a BART determination for SJGS in the Federal Register, and not the state's effort to demonstrate BART, but does recognize the need for timely action under Section 169A of the Act.

Colorado suggests that EPA carefully evaluate the NOx emission control costs for this facility to ensure that an accurate evaluation is performed to determine the cost effective air pollutant reductions for improving visibility in Class I areas, including nearby Mesa Verde National Park (located north about 25 miles away). Colorado is supportive of efforts to evaluate and promulgate cost effective emission controls for this facility – the 10th largest NOx source[1] in the nation at 18,359 tpy – that can provide significant air pollutant reductions to improve visibility in

[1] Based on 2009 Clean Air Markets Division (CAMD) data by facility.

Class I areas like Mesa Verde National Park, and provide other environmental benefits. We recognize that control costs can vary in retrofit situations, however, so we encourage EPA to closely evaluate the information it has received, including as appropriate working with the State of New Mexico to evaluate New Mexico's recent BART analysis update[2,3], to facilitate the selection of the most appropriate NOx control technology based on consideration of the five factors.

Colorado notes that EPA has exercised the flexibility inherent in the agency's BART regulations. Colorado also notes that EPA's proposed BART determination for SJGS results in considerable nitrogen oxide emissions reductions and associated visibility improvements at a number of Class I areas, including nearby Mesa Verde National Park which is estimated to realize a 2.88 delta deciview improvement[4] from EPA's proposed installation of selective catalytic controls. If determined cost effective considering the five factors, this would provide a substantial visibility benefit for the Four Corners region which Colorado would support.

Colorado appreciates the opportunity to provide this input to EPA for this important rulemaking.

Sincerely,

Paul Tourangeau
Director
Air Pollution Control Division

cc: Martha Rudolph, CDPHE
Mary Uhl, NMED

[2] PNM San Juan Generation Station BART Analysis Update, dated February 11, 2011.
[3] New Mexico Environment Department Air Quality Bureau BART Determination on Public Service Company of New Mexico San Juan Generation Station, Units 1-4, dated February 28, 2011.
[4] Based on EPA modeled maximum impacts of the 98the percentile delta dv impacts from 2001-2003 that was presented in Table 8 of the Federal Register 76 FR 503, dated January 5, 2011.