



October 13, 2008

Via Email

Faye Weber
Air Quality Division
DEQ State Office
1410 N. Hilton
Boise, ID 83706
faye.weber@deq.idaho.gov

Re: Request for an Extension of the Public Comment Period
Southeast Idaho Energy (SIE) Power County Advanced Energy Center (PCAEC)
Docket No. AQ-0819, Project No. P-2008.0066

Dear Ms. Weber -

I am writing on behalf of the Sierra Club and its members to request an extension of the public comment period for the draft air quality permit issued for SIE's Power County Advanced Energy Center. The size and complexity of the proposed facility and its potentially significant environmental effects warrant a longer, more comprehensive public review period.

The Sierra Club is the nation's oldest grassroots organization. It has more than 750,000 members nationwide, with over 2,800 members in Idaho, and is dedicated to the protection and preservation of the natural and human environment. One of the Sierra Club's main national priorities, the Smart Energy Solutions Conservation Initiative, tackles the pressing problems of global warming, air pollution, and our national dependence on polluting, non-renewable energy sources such as coal. A central part of this initiative is to promote the use of clean energy sources by encouraging individuals and businesses nationwide to develop, invest in, and use clean energy sources. The Sierra Club and its members have a long-standing interest and expertise in the development and use of energy resources as well as in air quality issues nationwide and these issues remain at the forefront of the Club's conservation efforts.

The draft permit for SIE's Power County Advanced Energy Center was made public on September 24, 2008. According to the "Notice of Public Comment Period and Public Hearing Regarding an Application for a Permit to Construct and Operate an Air Pollution-Emitting Source," the public comment period will extend from the date the draft permit was made

available through 5:00 p.m. on October 24, 2008. Given the size and technically complex nature of this proposal, the Sierra Club respectfully submits that an extension of the comment period will allow the public and other agency stakeholders the opportunity to make complete, accurate and meaningful comments on this draft permit. Additionally, the Idaho Department of Environmental Quality has not yet made the modeling files publicly available, so there is no opportunity for public review and comment on this important aspect of the permit at this time.

The Idaho Department of Environmental Quality will benefit from more public input, as the final permitting decisions will be better informed on a host of issues. We expect numerous very important, yet highly complex technical issues to be addressed in the permitting hearings, which call for additional expert input and a more thorough analysis than can be provided in the current limited time period. These include, but are not limited to, the BACT determinations for the emissions sources at issue in this permit; the modeling of air pollution impacts on ambient air quality and visibility; the greenhouse gas impacts associated with the proposed facility; and the consumption of Prevention of Significant Deterioration increments.

As you can see, a complete analysis of the proposed facility will require extensive analysis, and the list above is in no way exhaustive. More time is needed for the public participation period to provide a sufficient opportunity for meaningful comments regarding the environmental impacts of this project. For example, the Sierra Club needs time to retain the appropriately qualified power plant and air quality engineers to conduct a technical review of the draft permit. This requires considerable time. Therefore, the Sierra Club requests that the Idaho Department of Environmental Quality extend the public comment period on the draft permit by sixty (60) days. This reasonable and necessary extension would set the comment period to close on December 24, 2008.

Thank you for your consideration of our request to extend the public comment period. The Sierra Club seeks to ensure that the public's opportunity to participate in this important permitting decision is maximized to the extent possible. If you have any questions about this request, please do not hesitate to call me at (415) 977-5709, or my colleague Andrea Issod at (415) 977-5544.

I look forward to hearing from you soon regarding your decision on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pat Gallagher', written over a horizontal line.

Pat Gallagher
Director of Environmental Law
Sierra Club