

# **Attachment 3**

PacifiCorp Response to Sierra Club Data Request 9.1 in Docket LC 77

LC 77 / PacifiCorp  
March 15, 2022  
Sierra Club Data Request 9.1

### **Sierra Club Data Request 9.1**

What is the maximum amount of coal that can be currently stockpiled at both the BCC mine and at the Jim Bridger plant?

- (a) Could the maximum stockpile capacity identified in response to the question above be expanded? If not, why not?

### **Response to Sierra Club Data Request 9.1**

Bridger Coal Company's (BCC) existing air quality permit is changing and the new air quality permit has an effective date of April 1, 2022. The new permit has lower fugitive dust emissions than the existing permit and was adjusted to reflect changes associated with the underground mine closure. Effective April 1, 2022, BCC's maximum live stockpiled coal storage is 675,000 tons and the maximum sealed stockpiled coal storage is 1,900,000 tons.

The Jim Bridger Plant's existing air quality permit limits coal stockpile inventory to a maximum of 1.5 million tons of coal at any one time, with the plant annual average tonnage no more than 1.331 million tons.

- (a) In principle, BCC could petition the Wyoming Department of Environmental Quality (DEQ) to expand the stockpiled coal storage capacity via an air quality permit revision. An increase in capacity and/or emissions would be considered a "major revision", requiring extensive modeling, studies, a public comment period and ultimately Wyoming DEQ approval.

Like BCC, an increase of the Jim Bridger plant's coal stockpile limits would trigger an air permitting action. An increase of the coal stockpile inventory would require an evaluation of air emission increases resulting from the project. If the emission increases were determined to be significant, air modeling would be required to determine impacts to National Ambient Air Quality Standards (NAAQS). The project would also require an evaluation of best available control technologies to control emissions from the Jim Bridger stockpiles.