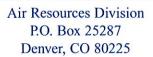


## United States Department of the Interior

## NATIONAL PARK SERVICE





November 15, 2010

N3615 (2350)

Andy Ginsberg Director, Division of Air Quality Department of Environmental Quality 811 SW 6th Avenue Portland, OR 97204

Dear Mr. Ginsberg,

On October 29, 2010, Oregon Department of Environmental Quality's (DEQ) reopened the public comment period for proposed revisions to the Best Available Retrofit Technology (BART) requirements for the Portland General Electric (PGE) Boardman Power Plant. The objective of reopening the public comment period is to consider to an alternative to DEQ's second option that was proposed by PGE. The proposal currently under consideration would modify DEQ's Option 2 by extending the plant closure date two years to December 2020. PGE proposes a lower emissions requirement for sulfur dioxide (SO<sub>2</sub>) for 2018 to 2020, but also proposes emissions testing to assure that this lower emission limit would be achievable without requiring additional control equipment.

The National Park Service commented on October 1, 2010 on three DEQ options, and we refer DEQ to those technical comments. We continue to support DEQ's proposal as preferable to the PGE alternative currently under consideration.

We appreciate the opportunity to work with Oregon DEQ to improve visibility at our Class I national parks and wilderness areas. For further information regarding our comments, please contact Don Shepherd of my staff at (303) 969-2075.

Sincerely,

John Bunyak

Acting Chief, Air Resources Division

Pat Brewage

cc: Rick Albright
Director, Office Air, Water, and Toxics
U.S. EPA Region 10
1200 Sixth Avenue
Seattle, WA 98101

Brian Finneran Division of Air Quality Oregon Department of Environmental Quality 811 SW 6th Avenue Portland, OR 97204