Owens, Mike

From: Nathan Miller <nmiller@npca.org>
Sent: Thursday, January 21, 2016 3:44 PM
To: Owens, Mike; R8AirPermitting
Subject: Comments on Deseret Bonanza MNSR Proposed Permit
Attachments: 2016-01-21 NPCA Bonanza Comments.pdf; 2016-01-05 NPS Bonanza Minor NSR comments.pdf

Please see attached comments regarding the proposed MNSR permit for the Deseret Bonanza Power Plant.

Nathan Miller
Engineering & Science Manager, Clean Air Program
National Parks Conservation Association
Phone: 312.263.0111 | Cell: 773.230.5823

January 21, 2016

Mr. Mike Owens
U.S. EPA, Region 8 Air Program, 8P-AR
Tribal Permit Program
1595 Wynkoop Street
Denver CO 80202

Via email to owens.mike@epa.gov and r8airpermitting@epa.gov

Re: Draft Permit No. MNSR-UO-000004-2015.004

Dear Mr. Owens,

On behalf of the National Parks Conservation Association and our million members and supporters we respectfully submit the following comments regarding EPA's proposed air quality minor new source review permit for the Deseret Power Electric Cooperative's Bonanza Power Plant in Vernal, Utah. We appreciate the opportunity to submit comments.

NPCA's mission is to protect and enhance America's national parks for the use and enjoyment of present and future generations. Our members and supporters regularly visit and care deeply about Canyonlands National Park, Arches National Park, and the other units of the National Park Service in and near Utah.

We support and incorporate the January 5, 2016 comments submitted by the National Park Service on this matter, and echo their observations and requests (attached). Specifically:

- We encourage EPA and all parties to expedite installation of the proposed low-NOx burners and overfire air such that they are installed during the facility's spring 2016 outage.
- We note the significant impacts from NOx emissions from Bonanza to visibility impairment at the Class I areas Arches and Canyonlands as well as to visibility impairment and nitrogen deposition at the nearby Class II area Dinosaur National Monument.
- We encourage EPA to perform a reasonable progress analysis for Bonanza under the Regional Haze Rule as soon as possible to determine additional emission reduction

measures that are available to benefit the parks and wilderness areas that continue to be impacted by Bonanza's emissions.

We appreciate your consideration of these comments.

Sincerely,

Nathan Miller
Engineering & Science Manager, Clean Air Program
National Parks Conservation Association
Phone: 312.263.0111 | Cell: 773.230.5823

United States Department of the Interior

NATIONAL PARK SERVICE
Air Resources Division
P.O. Box 25287
Denver, CO 80225-0287

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N3615 (2350)

January 5, 2016

U.S. EPA Region 8 Air Program, 8P-AR
Tribal Permit Program
1595 Wynkoop Street
Denver CO 80202

Attn: Michael B. Owens

Re: MNSR-UO-000004-2015.004

Dear Mr. Owens:

Thank you for inviting comments on application for a minor source permit that regulates air pollution emissions from the Deseret Power Electric Cooperative (Deseret) Bonanza Power Plant (Bonanza). We appreciate that this draft permit action represents a major effort in resolving a longstanding problem and that it will result in a significant reduction in emissions of nitrogen oxides (NO_X) in the vicinity of several of our park units.

Facility Description

Deseret owns and operates the 500 MW coal-fired steam electrical generating Bonanza Power Plant, near Bonanza, Utah, on the Uintah & Ouray Indian Reservation. Of 3,421 Electric Generating Units, EPA Clean Air Markets data for 2014 rank the Bonanza facility #26 for NO_X emissions at 7,057 tons.

Bonanza's Impacts on National Park Service Units

There are 14 Class I areas within 300 km of Bonanza, five of which are administered by the National Park Service (NPS). The nearest NPS Class I areas are Arches and Canyonlands

National Parks, 150 and 180 km south-southwest of Bonanza, respectively. Our CALPUFF modeling predicts that Bonanza contributes significantly (> 0.5 deciviews) to visibility impairment at both of these national parks; 76% of the impairment is due to NO_3. The nitrogen Deposition Analysis Threshold (DAT) is not exceeded in either park.

The closest NPS unit is Dinosaur National Monument (DINO), a Class II area about 35 km north of the plant. VISCREEN Level 1 modeling predicts that perceptibility criteria within DINO are being exceeded. Our CALPUFF modeling predicts that Bonanza is causing over 6 deciviews (dv) of visibility impairment at DINO and contributes at least 0.5 dv of impairment on about half of all days per year; 66% of the impairment is due to nitrate (NO_3). Nitrogen deposition at DINO is predicted to exceed our nitrogen DAT by a factor of 35 times, which is a concern for us in this ecologically-sensitive area.

EPA's Proposed Action

We are pleased that the draft permit includes a proposal by EPA and Deseret to partially address comments we submitted in 2002 by reducing NO_X emissions (by about 25%) by installing low-NO_X burners and overfire air. It is our understanding that it may still be possible for Deseret to install these new combustion controls during the spring 2016 scheduled outage, and we encourage all parties to expedite that installation. It is also our understanding that condition #11 of the proposed settlement, upon which this proposed permit is based, recognizes that Bonanza may still be subject to a "reasonable progress analysis" under the Regional Haze Rule. We encourage EPA to conduct such a "reasonable progress analysis" as soon as possible once condition I.C.2. of the proposed permit is satisfied and normal NO_X emissions are determined. Such a "reasonable progress analysis" is necessary to evaluate potential ways to further reduce impacts upon our park resources.

We look forward to working with EPA on this and other issues affecting our agencies. Please feel free to contact Don Shepherd at don_shepherd@nps.gov or 303-969-2075 if you have any questions.

Sincerely,

Susan Johnson
Chief, Policy, Planning, and Permit Review Branch

cc:
IMR: Mark Miller, Mike George
ARD-WASO: Julie Thomas McNamee
ARD-DEN: Johnson, McCoy, Vimont, Permit Review Group, Reading and Project File
ARD-DEN:dshepherd:2075:1/11/2016:Bonanza MNSR comments