Owens, Mike

From: Shepherd, Don <don_shepherd@nps.gov>
Sent: Monday, January 11, 2016 11:32 AM
To: Owens, Mike
Cc: Michael George; Mark Miller; Carol McCoy; Susan Johnson; John Notar; Julie McNamee; John Vimont
Subject: Bonanza Minor NSR permit comments
Attachments: Bonanza Minor NSR commemts (2).pdf

Mike,

Please accept our attached comments in support of the Bonanza Minor NSR permit. We hope that installation of the proposed combustion controls can be expedited.

Thanks for all of your work on this.

--
Don Shepherd
National Park Service
Air Resources Division
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"the man who really counts in the world is the doer, not the mere critic" TR 1891

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