

Owens, Mike

Portions of this document have been redacted. Personal privacy privilege asserted.

From: CarolA [REDACTED]
Sent: Tuesday, February 03, 2015 9:30 PM
To: Owens, Mike
Cc: Carol Smith
Subject: Comments on Deseret Bonanza Proposed PSD Correction Permit

Dear Mike

After my review of the proposed correction to the Deseret Bonanza PSD Permit, I have the following comments:

I do not agree with looking back to the year 2000 to applying the BACT Analysis. BACT as it would be determined at the time of this new permitting action in 2015 should apply. It is apparent by the evidence in the Statement of Basis that Deseret Bonanza ("Deseret") did not provide EPA with an accurate PSD Permit Application in the year 2000 timeframe. Deseret has continued to make the case that they did not trigger PSD review by a major modification well into 2005 until actual CEMS data showed that there was an actual significant net emission increase for NOx. Deseret continues to assert various exemptions to avoid PSD review. EPA's claimed responsibility for the delayed PSD permit, therefore giving justification to taking BACT fifteen years back in time, is not correct. Deseret was a fault and should not be given leniency. An EPA mistake would not have been made except for Deseret's failure to be upfront or honest with the EPA regarding the modifications already constructed without a PSD Permit, along with the resulting increased capacity for Bonanza to generate more electricity while burning more coal and increasing NOx emissions.

From a compliance standpoint, actual CEM emission data show that Deseret has violated the PSD provisions of the Clean Air Act. If this proposed correction PSD permit with BACT from the year 2000 applied, Deseret will only have to install controls that they should have installed 15 years ago. EPA's own coal fired power plant enforcement initiative required Consumer's Energy in a 9/16/14 settlement to install Selective Catalytic Reduction with a NOx Limit of 0.080 lbs/MMBTU at four of their power plants. Deseret Bonanza's proposed limit of 0.28 lbs/MMBTU is much higher and not justified. Given Deseret's actual violation, their resulting NOx emission limit should be closer to that of the Consumer Energy Settlement of 0.080 lbs/MMBTU.

Deseret has also enjoyed an economic benefit by avoiding the installation on control equipment and the operation and maintenance of that equipment for fifteen years. Even just the avoided O&M costs of BACT in year 2000, OFA, adds up to \$2,342,580, giving Deseret an unjust economic advantage over their competitors. This should be referred to your enforcement staff.

The air quality has been adversely affected also by the 15 years of increased emissions without using BACT. The proposed correction permit cannot reverse the impact that has been made on ambient air quality during that time.

Thank you for the opportunity to comment.

Sincerely,

Carol A. Smith
[REDACTED]
[REDACTED]
[REDACTED]
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