



UINTAH COUNTY

STATE OF UTAH

Our Past is The Nation's Future

COMMISSIONERS:

Michael J. McKee

William C. Stringer

Mark D. Raymond

ASSESSOR - Barbara Simper

ATTORNEY - G. Mark Thomas

CLERK-AUDITOR - Michael W. Wilkins

RECORDER - Brenda McDonald

TREASURER - Wendi Long

SHERIFF - Vance Norton

SURVEYOR - John Slauch

January 27, 2015

Michael B. Owens, Air Program (SPAR),
U.S. EPA, Region 8
1595 Wynkoop Street, Denver, CO 80202-1129
<http://www2.epa.gov/region8/air-permitpublic-comment-opportunities>.

Re: Prevention of Significant Deterioration (PSD) correction permit No. PSD-U0-000004-2014.00,
Bonanza Power Plant Unit 1

Uintah County is opposed to any corrective PSD modification of the Bonanza Power Plant PSD permit which would require substantial new technology as a retrofit to the existing generating unit.

The Bonanza Power Plant and its operations have provided economic stability in our region. The Bonanza unit employs over 110 personnel and is separate from oil and gas industries, providing diversity to our economy.

The United States EPA recently issued a Final Title V operating permit to Deseret Power, the plant operator. The Final Title V does not require any upgrade or retrofit; rather, it recognizes that Deseret has fully complied in making application for, and operating in accordance with all necessary permits for the Bonanza Plant.

If the proposed PSD measure is finalized, it would require that the Plant prematurely upgrade its combustion control system. This action does not appear to be required at this time.

Now, EPA *on its own initiative*, has announced that it wishes to change the decision EPA itself made with respect to the PSD Permit it issued fifteen years ago. In 2000, when Deseret installed an upgraded, efficient rotor at the Plant, it did so in good faith reliance on EPA and the State of Utah. Both approved the project, issued permits and made the determination that going forward with the rotor upgrade would *not* require the electric consumers in this region to absorb increased power rates to pay for any emissions control improvements beyond those installed with the project.

Deseret relied on EPA in good faith, and did so for the benefit of the businesses, industry, agriculture, employees, and public institutions in our region. Had the 2000 PSD Permit required additional upgrades, Deseret would not have undertaken the project. Now, some fifteen years later, EPA has decided *on its own* that it may wish to *change* the determination it made all those years ago. That is not equitable nor fair.

This action, which may well be outside any provision or regulation provided for under the Clean Air Act, could have a substantial negative impact on the economic viability of a significant region covering Northeastern Utah and Northwestern Colorado.

Based on our information, the rotor project did not cause, or even enable, any increase in emissions from the Bonanza unit. Prior to the electric market disruption of late 2000 and 2001, Bonanza, like many plants in the western U.S., experienced significant dispatch de-rates that were purely economic in nature. Bonanza simply could not find willing buyers for all its output. The installation of the rotor in 2000 was part of a larger project which included upgrading the facility to new low-NOx emitting burners. If anything, the project *reduced* emissions – it did not increase them.

Following the 2000-01 electric market crisis, Bonanza and other energy industry participants saw a dramatic increase in the hours of operation and the level of operation. The increased level of operating hours were not related to nor caused by the 2000 rotor installation – it was purely a consequence of market economics.

Bonanza lowered its emissions of NOx at the time it installed low NOx burners in 2000. There is no need to address NOx emissions from Bonanza. A recent report from our Uintah Basin Ozone Study (2013 Field Study Update) highlights that, “The Bonanza power plant plume does not appear to contribute any significant amount of nitrogen oxides or other contaminants to the polluted boundary layer [in the Uintah Basin] during ozone episodes; the thermally buoyant Bonanza plume ...penetrates through the temperature inversion layer. As a result, emissions from the Bonanza plant are effectively isolated from the boundary layer in which the high ozone concentrations occur.”

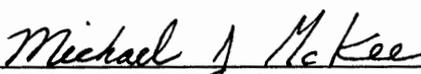
The real economic impact in a decision requiring premature installation of more pollution controls at the Bonanza power plant will be borne by a disproportionate number of already hard-pressed residential, agricultural and other electric consumers in the Uintah Basin and other rural areas served by the Bonanza plant.

It is our position that we support the Bonanza Plant. For the reasons stated, Uintah County opposes the proposed corrective PSD Permit action against the Bonanza generating unit. We urge you to give full effect and honor the reliance that Deseret has made on EPA’s approval of 2000 rotor efficiency project. Honor the emissions limits established under EPA's existing approved PSD.

Thank you for your consideration of our comments. If you have any questions, please feel free to contact us at 435-781-5380.

Sincerely,

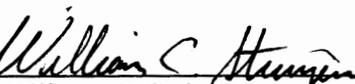
UINTAH COUNTY COMMISSION



Michael J. McKee, Chairman



Mark D. Raymond



William C. Stringer

cc: Kimball Rassmussen, CEO DG&T