Owens, Mike

From: Associated Governments of Northwest Colorado [agnc.media@[redacted]
Sent: Monday, June 16, 2014 3:14 PM
To: Owens, Mike
Subject: Comments Re: Bonanza Power Plant Title V Permit Application
Attachments: AGNC Bonanza comment letter.docx

Mr. Owens,

Please see attached comment letter.

Regards,

Kelly Sloan, AGNC

AGNC

ASSOCIATED GOVERNMENTS OF NORTHWEST COLORADO

June 12, 2014

Michael B. Owens, Air Program (8P-AR),
U.S. EPA, Region 8,
1595 Wynkoop Street,
Denver, CO 80202-1129

Re: Bonanza Power Plant Title V Operating Permit

Dear Mr. Owens,

On behalf of our member governments, the Associated Governments of Northwest Colorado express their strong support for the issuance of a Title V Operating Permit for the Bonanza Power Plant. This facility is supplied exclusively by the Deserado coal mine located near Rangely, CO, in Rio Blanco County.

As the result of yet another lawsuit by a fringe activist group, we understand that the EPA is considering the pulling of a crucial permit issued almost 15 years ago, as part of this revisitation of the Title V permit. Rescinding this permit, and imposing severe new restrictions and emission controls as a condition to re-issue would result in the plant ceasing operations – and consequently shutting down the Deserado mine in Rio Blanco County, which lacks the infrastructure to ship its product to any other user.

This scenario is entirely unacceptable. The Deserado mine employs 165 miners directly, and creates many more jobs indirectly, most in the Rangely area. The mine generates millions of dollars in revenue to state and local government, through royalties, Sales and Use taxes, property taxes, severance tax, reclamation tax, and others. The mine has also contributed more than $300,000 to the Rangely hospital. The elimination of this mine, these jobs, and these contributions to the local economy would be devastating for the community of Rangely and for both Rio Blanco and nearby Moffat counties.

These are not just abstract numbers. Real middle-class families will be terribly impacted by the shutdown of this plant, and of this mine; rents and mortgages will go unpaid, children's educations will not be funded, businesses will be closed – gut-wrenching financial and life decisions will need to be made as livelihoods and life savings are eliminated by the stroke of a pen.

For all of the economic devastation that a refusal to properly issue the Title V operating permit would wreak on the region, there is no justifiable, scientific basis for it. Colorado is renowned

world-wide for our clean coal, which is very low in both mercury and sulfur content. The allegations that the Bonanza plant is somehow emitting tons of pollutants is demonstrably false. The Bonanza Power Plant was rated among the top 20 cleanest in 2002, and a 2013 Uintah Basin Ozone Study Prepared by researchers and air quality managers at Utah State University, University of Utah, National Oceanic and Atmospheric Administration, ENVIRON, University of Colorado, Utah Department of Environmental Quality, and your agency, stated 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 during ozone episodes." In addition, Bonanza was one of the first plants in the nation to adopt Best Available Pollution Controls, ahead of many other plants which were grandfathered in. In short, the Bonanza plant is a clean facility that is not creating air quality problems that would necessitate this action on the part of the EPA.

The AGNC strongly oppose the predatory actions of extremist litigation groups that misuse legislation to pursue an assault on middle class Americans by opposing any and all responsible energy development. Time after time, we find ourselves defending our member governments and the people they represent against these unconscionable and agenda-driven lawsuits. We ask that the EPA, as a responsible agency of the federal government, stop being party to these egregious lawsuits that have no other effect than to hurt regular Americans, and cripple our economy.

We insist that the permit be issued to Bonanza under the same conditions for which it was applied, and that the plant not be required to submit to onerous and unreasonable new restrictions and controls that will eliminate the livelihoods and financial security of hundreds of good people.

Sincerely,

Mike Samson
Chairman, AGNC
Garfield County

Jeff Eskelson
Vice Chairman, AGNC
Rio Blanco County