DESERET POWER
ELECTRIC COOPERATIVE

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Vernal, Utah 84078
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June 3, 2015

Carl Daly, Director
Air Program (8P-AR)
US EPA Region 8
1595 Wynkoop Street
Denver, CO 80202-1129

Title V Permit Number: V-UO-000004-00.00

Re: Title V Permit Administrative Amendment

Dear Mr. Daly,

Pursuant to 40 CFR 71.7(d) and condition IV.H.1 of the Bonanza Power Plant's Title V Permit, number V-UO-000004-00.00 (Permit), Deseret Generation & Transmission Co-operative (Deseret) can request an Administrative Permit Amendment to a Title V Permit. The following amendments are being requested at this time to the Permit:

1. **Permit Applicant, Owner and Operator of the Bonanza Power Plant:** In response to your letter dated February 19, 2015 regarding "Request for Confirmation that Deseret is Seeking An Administrating Permit Amendment", Deseret is requesting EPA to make the stated change to the Permit. The Permit applicant, owner and operator of the Bonanza Power Plant should have been "Deseret Generation & Transmission Co-operative" not "Deseret Power Electric Cooperative". This correction should be made to any like reference throughout the whole Permit. It is deemed that the EPA inadvertently made this error while drafting the Permit.

2. **Condition II.A.2.(e)(ix) on Page 30-31 of Permit**: The relevant language from 40 CFR 60.49Da(i)(5), which says that for affected facilities determining span values under 40 CFR 60.49Da(i)(3)(ii), SO2 span values shall be determined according to section 2.1.1 in appendix A to 40 CFR Part 75. Deseret operates a dual-span SO2 CEMS, which is allowed for in Part 60 via the stated cross-reference to Part 75. It is deemed that EPA inadvertently omitted this cross-reference in the Permit and requests that it is added.

3. **Condition II.A.3.(d)(ii) on Page 54 of Permit**: The paragraphs referring to 40 CFR 63.10031(f) need to be amended to reflect the current version of the regulation. The current regulation states until April 16, 2017 the results of performance tests required by 40 CFR Part 63, Subpart UUUUU must be submitted to EPA's ECMPS database and that after April 16, 2017 the results must be submitted to EPA's CEDRI database. This request is being made because 40 CFR 63.10031(f) was revised by EPA after the Permit was issued. Therefore, the permit is now in error by not accurately reflecting the current requirements.

4. **Condition II.A.7.(b) on Page 67 of Permit**: The cross-references to conditions II.A.5.(b) and II.A.5.(c) in this paragraph should have been II.A.6.(b) and II.A.6.(c), respectively. These cross-references should be amended to correct these inadvertent errors in the Permit.

5. **Attachment 1 (Bonanza Plant Process Description) of Permit on Page 2**: On page 2 of Attachment 1 (Bonanza Plant Process Description) of the Permit, the following paragraph under the section "Scrubber" should be amended to correct inadvertent errors and to read as follows (strikethrough is delete, red is add):

   Limestone is ground on site in ball mills and mixed with water to a ~~density~~ ~~of~~ percent solids by weight typically between 25% and 35% to produce the needed slurry. The slurry is mixed into the absorber modules that operate with a ~~to the module~~ percent solids by weight typically between 13% and 17%~~, with~~ and a pH typically between ~~5.5~~ 5.0 and 6.0. The base and lower portion of each module tower is the slurry reaction tank. Each module also includes a bulk entrainment separator and mist eliminator vanes for water droplet removal. A mist eliminator cleaning system is used to clean the vanes. On occasion, scrubber enhancers such as adipic acid are added to the slurry as needed to aid in the removal process. The solids formed in the scrubbing process are removed by a sludge handling system, mixed with flyash and conveyed or trucked to an on-site landfill.

6. **Attachment 1 (Bonanza Plant Process Description) of Permit on Page 3**: On page 3 of Attachment 1 (Bonanza Plant Process Description) of the Permit, the following paragraph under the section "Stack parameters" should be amended to correct an inadvertent error and to read as follows (strikethrough is delete, red is add):

   Stack parameters: The plant's main boiler stack is ~~604~~ 600 feet high. It is constructed with a concrete shell and acid resistant brick liner. The exit diameter is 26 feet with an average exit temperature of about 120 degrees F. The stack flow rate at full load is estimated to be about 1.3 million SCFM with the new ruggedized rotor installed and operating.

Any questions regarding this request should be directed to Mr. Eric C. Olsen, P.E., Bonanza's Environmental Superintendent. He can be reached at 435-781-5706 or eolsen@deseretpower.com.

Sincerely,

Eugene Grindle II
Plant Manager

GG/eco
Enclosure (1)

cc: David Crabtree (Deseret Power)
Gordon Howell, Chairman (Ute Indian Tribe)
Layne Burningham (Utah Municipal Power Agency)

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 6/30/2015

Federal Operating Permit Program (40 CFR Part 71)

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Grindle II (First) Eugene (MI) ____

Title Plant Manager

Street or P.O. Box 12500 E 25500 S

City Vernal State UT ZIP 84078 - 8525

Telephone (435) 781 - 5701 Ext. ____ Facsimile (435) 781 - 5816

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) _____

Name (typed) Eugene Grindle II Date: 6 / 3 / 2015