June 14, 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 citizens, the Town of Rangely would like to express our strong support for the Bonanza Power Plant to be issued a Title V Operating Permit. 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. Rural Communities' services like ambulance, fire, hospitals, schools, water, library, etc., are all "Special Districts" that are funded through taxes. The Town of Rangely's operating income is about 60% from FML Distributions/Severance Tax. 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. The Bonanza Power Plant employs 105.

These are not just abstract numbers. Real middle-class families will be terribly impacted by the shutdown of this plant, or 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. Even if the Bonanza Power Plant is only forced to upgrade, put in new controls, or change power base, the power rates could increase 40% or more, would result in absolute devastation to our town.

209 E. MAIN STREET, RANGELY, COLORADO 81648
(970) 675-8477 FAX: (970) 675-8471 E-MAIL: TOWN_OF_RANGELY@RANGELY.COM

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 allegation 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,

When the PSD permit was issued for this plant some 15 years ago, no Title V permit was required. In good faith, the operators of the Bonanza Power Plant, Deseret Power, went beyond permit requirements and installed additional equipment to ensure air quality standards. 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.

At the time the PSD permit was issued air control equipment was designed to help operators, like Bonanza, to repay the cost of the equipment over an extended period of time; the company is not yet halfway through those payments. 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.

The Town of Rangely strongly opposes 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 town and the people we 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 an financial security of hundreds of good people.

Thank you for your consideration of our comments. If you have any questions, please feel free to contact me.

Sincerely,

Lisa Hatch

Lisa Hatch
Town Trustee