DESERET POWER
ELECTRIC COOPERATIVE

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September 16, 2002

Part 71 Permitting Contact- Michael B. Owens
Air and Radiation Program (8P-AR)
999 18th Street, Suite 300
Denver, Colorado 80202-2466

Re: Comments on Draft Title V Permit

Dear Mr. Owens:

Deseret is pleased to comment on the draft Title V operating permit V-OU-0004-00.00 for the Bonanza Power Plant. Deseret appreciates the amount of time and effort you and your colleges at Region 8 have put in during this permitting effort. This Title V permit represents the efforts of many people from Region 8, the State of Utah Division of Air quality and Deseret Power. This permit will enable the Bonanza Power Plant to remain one of the cleanest coal fired power plants in the world.

First, we have reviewed your analysis of the Deseret comments on the pre-draft permit. We agree with the resolution of all the Deseret comments except for the issue of subpart Y applicability to the coal storage and conveying equipment at the plant. Deseret feels that any subpart Y permit conditions should apply only to the coal crusher building. Your comments and the permit language allude to the fact that during the operation of the crusher the coal handling equipment is treated as part of the subpart Y system and when the crusher is not running, the coal handling equipment is part of the subpart Da facility. Deseret still feels that the coal unloading, storage and conveying systems at the plant are part of the subpart Da facility and not part of the subpart Y facility. The above mentioned systems run independently of the crusher and are an integral part of the entire generating system not the crusher.

60.251 (i) refers to equipment used to transfer or load coal for shipment. No coal is shipped from the plant.

The following are the comments on the draft permit:

1. On page 8 in the description section, there is a period in between "fired" and "on" in the third sentence.

2. On page 11 under (ii) in the last sentence, "auithority" is misspelled.

3. On page 25 in paragraph (x)(1), "udner" is misspelled.

4. On page 26 in paragraph f (1), there is a missing space between "under$60.8"

5. On page 30 in paragraph (ix) should the words "semiannual and semiannually" be hyphenated?

6. On page 31 in paragraph (I), there is a period between EPA and Regional

7. On page 32 in paragraph (v) and (iii) should "EPA-approved" be hyphenated?

8. On page 37 in paragraph c. (iii) (1) should the word "subaccount" be hyphenated?

9. On page 48 in paragraph III.C. 1 should the words " semiannual and semiannually" be hyphenated?

10. On page 49 in paragraph (I), there needs to be a space in between pollutant(as identified.

11. On page 58 in paragraph IV.E.1 should "reissuing" be hyphenated?

12. On page 59 in paragraph IV.H should the words "reissue and reissuance" be hyphenated?

13. On page 59 in paragraph IV.I.1.e should "preconstruction" be hyphenated.

14. On page 2 of attachment 1 in the second paragraph "Pollution Control Systems", "ABB wet scrubber" should be changed to "Combustion Engineering wet scrubber".

15. On page 3 of attachment 1 in the paragraph "Low NOx Burners", "Advanced Technologies" should be "Advanced Burner Technologies".

If you have any questions regarding these comments please contact Howard Vickers or Mike Goddard at the plant.

Sincerely,

Stanley J. Gordon

Stanley J. Gordon
Plant Manager

Cc: David Crabtree