RANGELY HOSPITAL

RANGELY DISTRICT HOSPITAL
225 Eagle Crest Drive
Rangely, CO 81648

6/12/2014

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,

Rangely District Hospital (RDH) is opposed to the modification of the Bonanza Power Plant PSD permit requiring substantial new technology through the issuance of a Title V Federal Operating Permit. When the PSD permit was issued for this plant some 15 years ago, no title V permit was required. When this permit was issued it was our understanding this permit was valid for 30 years and at the time the Bonanza Power Plant went beyond what was required and was actually rated among the top 20 cleanest in 2002. Furthermore, 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.

If the EPA pulls this crucial permit issued almost 15 years ago, as part of this revisitation of the Title V permit the local impact will be devastating. Rescinding this permit, and imposing severe new restrictions and emission controls as a condition to re-issue would result in significant damage with the very real possibility of the plant ceasing operations and consequently shutting down the Deserado mine in Rio Blanco County.

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 RDH directly. The elimination of this mine, these jobs, and these contributions to the local economy would be devastating for the community of Rangely and Rio Blanco County.

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.

The employees of RDH strongly oppose the predatory actions of litigation groups that misuse legislation to pursue an assault on middle class Americans by opposing any and all responsible energy development. 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,

Edward N. Goshe III

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Rangely, CO 81648
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