IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE
Air Resources Division
P.O. Box 25287
Denver, CO 80225

September 19, 2002

N3615 (2350)

Mr. Michael B. Owens
Air Technical Assistance Unit
US EPA, Region 8
999 18th St., Suite 300
Denver, Colorado 80202-2466

Dear Mr. Owens:

Thank you for providing a copy of the proposed Title V operating permit and additional information for Deseret Generation and Transmission Cooperative's Bonanza Power Plant (Deseret). The Deseret facility is located 39 km southwest of Dinosaur National Monument, a Class II area administered by the National Park Service (NPS), and about 150 km north of Arches National Park, a Class I area also administered by NPS. We are especially interested in how the state made the determination in 1998 that the "ruggedized rotor" project was only a synthetic minor modification and did not trigger PSD review.[1] To our knowledge, we were never advised of, nor involved in, that action. We do not understand how this boiler could be up-rated from 440 MW to 500 MW[2] without an increase in actual emissions, unless Deseret acted to offset the increase in actual emissions by some physical change or change in its method of operation.[3] We are concerned that the reductions in allowable lb/mmBtu emission rates mentioned in the "Permitting History" do not reflect a reduction in actual emissions and what we are seeing are merely "paper" reductions.

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[1] Don Shepherd of this office talked with Tim Blanchard of the Utah DEQ on 9/18/02 and was told that Utah had been advised by EPA in 1998 that the "ruggedizd rotor" project did not trigger PSD. Mr. Blanchard also said that that project did not increase plant capacity.

[2] The 1998 Approval Order and supporting documentation state that boiler heat input was increased from 4381 mmBtu/hr to 4578 mmBtu/hr, and that "Approximately 20 MW from the upgrade will result from an increase in steam flow produced by the boiler. To date, the boiler has not been operated at its peak potential due to limitations of steam flow at the existing Turbine Generator. The Project will allow the Turbine Generator to accept all of the steam flow the Boiler is capable of producing. While the Ruggedized Rotor by itself will not result in any change in Bonanza 1's emissions, the increased capacity of the Turbine Generator to handle the Boiler's peak capacity will increase Bonanza 1's overall potential to emit (PTE)."

[3] We understand that Deseret proposed to install Low-NO_x burners.

We believe that these concerns are justified if one looks at past actual emissions at this plant compared to emission limits contained in the March 16, 1998 "Approval Order for Modification of Bonanza One Power Plant Emission Limits." For example, EPA's emissions data for 2000 (prior to installation of the "ruggedized rotor") show that SO_2 emissions were 1,038 tons, while NO_x emissions were 5,692 tons. Because the 1998 Approval Order and the draft Title V permit allow SO_2 emissions of 1,968 tons and NO_x emissions of 10,030 tons, there is reason to believe actual emissions may have increased by "significant" amounts and that PSD may have been triggered.

While we understand that the 1998 decision is past-history, we believe that a Title V permit should not be issued that essentially incorporates what may be a defective permit. We therefore ask that EPA Region VIII defer action on this permit until this issue can be resolved.

We appreciate the opportunity to comment on the Deseret Title V draft permit. If you have any questions regarding our comments, please contact Don Shepherd of my staff at (303) 969-2075.

Sincerely,

John Bunyak

John Bunyak
Chief, Policy, Planning and Permit Review Branch

cc:
Richard Long
Air and Radiation Program
EPA – Region 8
999 18th Street, Suite 300
Denver, Colorado 80202-2466