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Deseret
Generation & Transmission Co-operative

Bonanza Power Plant
12500 East 25500 South ☐ Vernal, Utah 84078-8525
(435) 789-9000 ☐ Fax (435) 781-5816

November 11, 1999

Ms. Ursula Trueman, Director
Utah Division of Air Quality
Department of Environmental Quality
P.O. Box 144820
Salt Lake City, Utah 84114-4820

Dear Ms. Trueman:

In a letter dated April 20, 1999, Deseret Generation and Transmission Cooperative notified the Utah Division of Air Quality (UDAQ) of the upcoming rebuild and upgrade of the pulverizers at the Bonanza Power Plant. The upgrade will take place during the year 2000 outage beginning in April. The pulverizer project was not considered for new source review (NSR) because it would create no net increase in emissions. In a letter dated May 20, 1999, the UDAQ agreed with the Deseret assessment regarding new source review for the pulverizer project.

As the engineering of the pulverizer project progressed, it became evident that components of the current burners in the boiler would not adequately meet the needs of the upgraded pulverizers. The diameter of the outer barrel and tip on the current burners was too small. This would have created greater velocities through the burner, which in turn would have caused the flame to reach farther into the boiler damaging the boiler tubes.

A review of the existing burners indicated that the outer barrel and tips could not be modified and would have to be replaced. The design of replacement barrels and tips will be identical to the design that is in the current burners except that a larger diameter outer barrel and larger tip will be built into the burners. The larger diameter barrels and tips will keep the velocities through the burners the same as they are now. This will keep the boiler from being damaged. NOx emissions will remain the same with the new burner parts installed.

Deseret feels that NSR should not apply to the barrel and tip replacement because the replacement barrels and tips will be identical to the current barrel and tip design except for the larger diameters. Also, the barrel and tip replacement will cause no increase in emissions. Finally, the new barrels and tips will not increase the capacity of the boiler.

Deseret requests that the UDAQ send us conformation of this NSR determination in a letter.

If you need further information on the burner replacement, contact Howard Vickers at the Bonanza Plant. We look forward to hearing from you on this issue.

Sincerely,

Stan Gordon
Plant Manager

CC: Mike Owens, EPA Region VIII
David Crabtree, Deseret G&T
Dan Howell, Deseret G&T