DESERET POWER
ELECTRIC COOPERATIVE

10714 South Jordan Gateway
South Jordan, Utah 84095
(801) 619-6500 Fax: (801) 619-6599

April 17, 2014

Carl Daly, Director
Air Program
U.S. EPA Region 8
1595 Wynkoop Street
Denver, CO 80202-1129
ATTN: Mike Owens

Re: Request for Information dated March 26, 2014 ("Request")

Dear Sir:

Deseret Generation & Transmission Co-operative ("Deseret") received the referenced Request for Information on March 31, 2014. The Request seeks information on the existing Bonanza power plant ("Bonanza Unit 1") which Request, in several respects, spans periods of nearly 20 years. The Request indicates that EPA is "planning to address potentially applicable PSD requirements that may have been triggered by Deseret's ruggedized rotor project..." that was initially permitted beginning in approximately 1998, well over 15 years ago.

Deseret intends to comply as fully as reasonably possible with the Request insofar as it seeks information contained in documents in Deseret's possession. Without limiting the foregoing, Deseret maintains that it properly permitted the 1998-2000 project undertaken at Bonanza 1, first by application and approval order of the State of Utah during the time the State was recognized and granted jurisdictional permitting authority, and also subsequently by PSD Permit issued directly by EPA Region 8 approving the project. Deseret relied, in deciding to undertake the project, on its good faith belief that the permitting actions of Utah DAQ and EPA Region 8 were valid when the permits issued, and that those permits would provide a continuing permit shield against subsequent changes or requirements imposed on the existing Bonanza facility arising due to the installation of that project many years ago. It is beyond question that, if either of those permit actions resulted in federal or state requirements to significantly modify or update pollution controls beyond the controls installed in connection with such permit action, Deseret would never have undertaken the rugged rotor at all.

Deseret objects in the strongest terms to any suggestion that revisiting the long-issued and well settled PSD Permits approving the completion of the project in 2000 would be proper or permissible at this extremely late date.

Deseret has commenced an effort to locate those records and documents that it possesses which may be responsive to the Request. A number of key individuals involved in the project in 1998-2000 have retired, and some are now deceased. Deseret has moved its primary offices and relocated document depositories several times in the intervening decade and a half.

Given the time span of years for which information is being requested, and the extremely long period of time that has passed since the project was permitted both by the State of Utah and by EPA, and the 14 years since the project was completed and installed at Bonanza, and the nearly 10 years since it was subsequently investigated by EPA in approximately 2005, locating and verifying the documents which still remain will require a good deal more time than the 30 days set forth in the Request.

It also appears that some of the requested information may not exist in any document or record that Deseret now possesses, although Deseret requests more time to make an adequate determination as to which of the requests, or the components of such requests, may fall into such a category. Moreover, a number of requests appear to us to be ambiguous, and Deseret reserves the right to seek clarification in order to both focus the search for responsive documents as well as to avoid misunderstanding.

Deseret has gathered a preliminary collection of records that appear to be responsive to the Request; those are attached hereto. The summary of the files we are transmitting herewith also includes the designation "confidential" to indicate those files that Deseret asserts as confidential trade secrets that must not be disclosed publicly. This preliminary response may be incomplete – only a more thorough search will determine what additional documents may be stored in additional files.

Deseret believes that a reasonably thorough search of its files will require a minimum of 90 additional days to complete. We intend to continue the effort to locate responsive material during that additional time, as well as to seek clarification as those questions come more clear in the course of our data gathering efforts.

Please feel free to contact me with any questions regarding Deseret's ongoing efforts to respond to this Request.

Very truly yours,

David F. Crabtree
Vice President, General Counsel

c. Kimball R. Rasmussen
Eric Olsen

ITEMS PRODUCED

DESCRIPTION:	RELATES TO:	Confidential Claim
102-01-016_STEAM_GENERATOR_GENERAL_ARRANGEMENT_CROSS_SECTIO.pdf	1A	Confidential
DD00_POWER_PLANT_CROSS_SECTION.pdf	1A	Confidential
Fastlook - 102-01-015_STEAM_GENERATOR_GENERAL_ARRANGEMENT_FRONT CROSS_SECTIO.pdf	1A	Confidential
Fastlook - A018_TRANSVERSE_SECTION-BOILER_AREA_.pdf	1A	Confidential
FastLook - DD06A_BF-BOILER_FUEL.pdf	1A	Confidential
FastLook - GA12_BOILER_AREA_GROUND_FLOOR_PLAN_EL_5028-0.pdf	1A	Confidential
FastLook - GA13_BOILER_AREA_PLATFORM_EL_5054-3.pdf	1A	Confidential
FastLook - GA14_BOILER_AREA_PLATFORM_EL_5068-5.pdf	1A	Confidential
FastLook - GA15_BOILER_AREA_PLATFORM_EL_5076-7.pdf	1A	Confidential
FastLook - GA16_BOILER_AREA_PLATFORM_EL_5085-11.pdf	1A	Confidential
FastLook - GA17_BOILER_AREA_PLATFORM_EL_5098-5.pdf	1A	Confidential
FastLook - GA18_BOILER_AREA_PLATFORM_EL_5109-11.pdf	1A	Confidential
FastLook - GA19_BOILER_AREA_PLATFORM_EL_5123-6.pdf	1A	Confidential
FastLook - GA20_BOILER_AREA_PLATFORM_EL_5133-0.pdf	1A	Confidential
FastLook - GA21_BOILER_AREA_FAN_PLATFORM_EL_5141-8.pdf	1A	Confidential
FastLook - GA22_BOILER_AREA_PLATFORM_EL_5150-9.pdf	1A	Confidential
FastLook - GA23_BOILER_AREA_PLATFORM_EL_5159-3.pdf	1A	Confidential
FastLook - GA24_BOILER_AREA_PLATFORM_EL_5167-9.pdf	1A	Confidential
FastLook - GA25_BOILER_AREA_PLATFORM_EL_5176-3.pdf	1A	Confidential
FastLook - GA26_BOILER_AREA_PLATFORM_EL_5187-9.pdf	1A	Confidential
FastLook - GA27_BOILER_AREA_INTAKE_LOUVER_PLATFORM_EL_5195-5.pdf	1A	Confidential
FastLook - GA28_BOILER_AREA_PLATFORM_EL_5213-0.pdf	1A	Confidential
FastLook - GA29_BOILER_AREA_RELIEF_LOUVER_PLATFORMS_EL_5222-4.pdf	1A	Confidential
FastLook - GA30_BOILER_AREA_PLATFORM_EL_5236-9.pdf	1A	Confidential
FastLook - GA31_BOILER_AREA_ROOF_PLAN.pdf	1A	Confidential
FastLook - GA58_PLANT_GENERAL_ARRANGEMENT.pdf	1A	Confidential
FastLook - GA59_TURBINE_AREA_TRANSVERSE_SECTION.pdf	1A	Confidential
FastLook - GA60_BOILER_AREA_TRANSVERSE_SECTION.pdf	1A	Confidential
FastLook - YGA1_DETAILED_YARD_GENERAL_ARRANGEMENT.pdf	1A	Confidential
FastLook - YGA2_DETAILED_YARD_GENERAL_ARRANGEMENT.pdf	1A	Confidential
reference to previously supplied documents.pdf	1A	Confidential
1B-Rated MW Capacity (1995-2014).pdf	1B	Confidential
Unit Rating 1999 (Page 16).pdf	1B	Confidential
WSCC Letter Bonanza 1 Rating.pdf	1B	
1D-Annual Heat Rate (1995 - 2014).pdf	1D	Confidential
Upper furnace temperatures daily.pdf	1E	Confidential
1F-Coal characteristics (1995 - 2014).pdf	1F	Confidential
1G-Coal & Fuel Oil Consumption (1995 - 2014).pdf	1G	Confidential
Advanced Burner 1997 Report after installation.pdf	1H	Confidential
Air Flow Science Meeting agenda combustion project Sept 2005.pdf	1H	Confidential
Air Flow Science project Final Design Winbox L-04-DG3-SA03 May 2004 (1).pdf	1H	Confidential
Air Monitor project submittal PA Flow Dec 2006.pdf	1H	Confidential
Babcock and Wilcox AireJet Burners Brochure E1013195 2008.pdf	1H	
Babcock and Wilcox Burners 4Z Brochure E1013177 2000.pdf	1H	
Babcock and Wilcox Proposal for Combustion and Pulverizer Improvement Jan 2004.pdf	1H	Confidential
Babcock and Wilcox Proposal P010917 Cover Letter - LNB Retrofit and OFA Addition Sept 2011.pdf	1H	Confidential
Babcock Power Burner Brochure 2011.pdf	1H	
Babcock Power Burner Brochure 2014.pdf	1H	
Burns and McDonnell FW e-mail Deseret Bonanza NOx.pdf	1H	Confidential
Burns and McDonnell Low NOx Study Proposal Letter June 2013.pdf	1H	Confidential

DESCRIPTION:	RELATES TO:	Confidential Claim
Deseret e-mail FW NOx.pdf	1H	Confidential
Deseret Gas addition to Bonanza Memo April 2001.pdf	1H	Confidential
Energy and Environmental Research corp New Burner Proposal, 1 Oct 1996.pdf	1H	Confidential
Energy and Environmental Research corp Proposal, 2 1996.pdf	1H	Confidential
Energy and Environmental Research corp Proposal, 3 1996.pdf	1H	Confidential
Energy and Environmental Research corp Proposal, 4 1996.pdf	1H	Confidential
Energy and Environmental Research corp Proposal, 5 1996.pdf	1H	Confidential
Energy and Environmental Research corp Proposal, 6 1996.pdf	1H	Confidential
Foster Wheeler FW NOx info e-mail.pdf	1H	Confidential
Fuel Tech 109108_SNCR Brochure.pdf	1H	
Fuel Tech 109225_LNB Brochure.pdf	1H	
Fuel Tech 109230_OFA Brochure.pdf	1H	
Fuel Tech Deseret Bonanza Unit 1 SNCR Demonstration Proposal 13-D-093 June 2013.pdf	1H	Confidential
Fuel Tech Information Request CUS-EST200906-ALL_Systems June 2013.pdf	1H	Confidential
Fuel Tech Low and High Sulfur Values - e-mail Deseret Power.pdf	1H	Confidential
Fuel Tech RE RFG - Combustion System Site Visiti Request e-mail.pdf	1H	Confidential
Fuel Tech SNCR Demo Presentation Meeting Handout Version June 2013.pdf	1H	Confidential
Fuel Tech Technology Spectrum Brochure.pdf	1H	
Fuel Tech Technology and SNCR Demo Meeting Agenda June 2013.pdf	1H	Confidential
Fuel Tech-109218_ASCR brochure.pdf	1H	
Fuel Tech -109602_Modeling Brochure.pdf	1H	
Info to FT 72-36933-001 Coal Ultimate_Ash Fusion_Elements_12_16_08.pdf	1H	Confidential
Info to FT Bottom Ash 99 Analysis.pdf	1H	Confidential
Info to FT Bottom Ash Analysis.pdf	1H	Confidential
Rosemount Proposal for CO Monitor, Feb 1997.pdf	1H	Confidential
SAS Global Burner Brochure 2010.pdf	1H	
STORM P10-14600-01-1594 Rev 3 Pulverizer Performance Kit and Testing Proposal Oct 2010.pdf	1H	Confidential
STORM P10-14600-01-1710 MPS 89 Pulverizer Performance Parts Proposal Nov 2010.pdf	1H	Confidential
STORM P10-14600-01-1923 Pulverizer Performance Parts for MPS MBF Mills Proposal July 2011.pdf	1H	Confidential
Storm Service Report Pulverizer Tests rev1 April May 2011.pdf	1H	Confidential
Thermo environmental Proposal for CO Monitor, Feb 1997.pdf	1H	Confidential
Zolo Tech BOSS Ottumwa Presentation EUEC Feb 2014.pdf	1H	Confidential
Babcock and Wilcox Proposal for Combustion and Pulverizer Improvement Jan 2004.pdf	2A(i)	Confidential
Babcock and Wilcox Proposal P010917 Cover Letter - LNB Retrofit and OFA Addition Sept 2011.pdf	2A(i)	Confidential
Burns and McDonnell FW e-mail Deseret Bonanza NOx.pdf	2A(i)	Confidential
Fuel Tech Deseret Bonanza Unit 1 SNCR Demonstration Proposal 13-D-093 June 2013.pdf	2A(i)	Confidential
1-9-14 email.pdf	2B	Confidential
1-18-12 email.pdf	2B	Confidential
2-7-14 email.pdf	2B	Confidential
BCES-NRECA CCEMC Full Proposal Final 2 6 14 Final.pdf	2B	Confidential
Board Strategic Planning Meeting 1-26-12.pdf	2B	Confidential
Bonanza Alternative Cases Results v2.pdf	2B	Confidential
comparison.pdf	2B	Confidential
cost estimate.pdf	2B	Confidential
Deseret Power's Bonanza Power Plant.pdf	2B	Confidential
Fuel Oil Usage.pdf	2B	Confidential
Fuel Oil.pdf	2B	Confidential
FW_Deseret burner estimates.pdf	2B	Confidential
Gas and Market Price Forecasts.pdf	2B	Confidential
Generation Costs 1-24-12pdf	2B	Confidential
Green Coal Solutions - Data Summary - Technical 2014 - Bradshaw.pdf	2B	Confidential
letter of support to Bobby Chen for Alberta CCEMC 01022014.pdf	2B	Confidential

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letter of support to Walter Fuqua for Alberta CCEMC.pdf	2B	Confidential
Natural Gas at Bonanza explanation.pdf	2B	Confidential
Natural Gas Installation at Bonanza.pdf	2B	Confidential
Natural Gas Retrofit.pdf	2B	Confidential
Natural Gas Service for Bonanza linda hamilton.pdf	2B	Confidential
Natural Gas Service for Bonanza.pdf	2B	Confidential
Notes on bringing natural gas to Bonanza.pdf	2B	Confidential
Production data of on site gas well.pdf	2B	Confidential
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RE_Natural gas service brent turner.pdf	2B	Confidential
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