VIA ELECTRONIC MAIL

Michael B. Owens, Air Program (8P-AR),
U.S. EPA, Region 8,
1595 Wynkoop Street
Denver, CO 80202-1129
Email: owens.mike@epa.gov

Re: EPA's Notice of Intent to Issue a Title V Operating Permit to Deseret Power Electric Cooperative's Bonanza Power Plant

Dear Mr. Owens:

On behalf of National Parks Conservation Association ("NPCA"), we support EPA's commitment to engage in a Prevention of Significant Deterioration ("PSD") permitting process for Deseret Power Electric Cooperative's Bonanza Power Plant ("Bonanza"). As explained by the National Park Service and confirmed by EPA's draft statement of basis, Bonanza constructed a ruggedized rotor project in 2000 that significantly increased actual emissions, thereby triggering the Clean Air Act's PSD requirements, including the application of Best Available Control Technology, or "BACT." 40 C.F.R. § 52.21.

Bonanza's failure to comply with the Clean Air Act's PSD requirements over the fourteen years that have passed since the 2000 rotor project occurred has resulted in excess pollution that not only compromises air quality, but is responsible for poor visibility or "haze" that has long marred the otherwise spectacular scenic landscapes in our nation's treasured parks and wilderness areas. As explained by EPA, "[r]egional haze is visibility impairment that is produced by a multitude of sources and activities which emit fine particles and their precursors and which are located across a broad geographic area." 64 Fed. Reg. 35,714, 35,715 (July 1, 1999). In addition to impairing visibility, nitrogen oxides also cause a range of serious ecological and health effects. Emissions of nitrogen oxide also cause nitrogen deposition harming susceptible plant and animal species. This is of particular concern in the region's beloved national parks including Arches, Canyonlands and Capitol Reef. Moreover, nitrogen oxides contribute to ground-level ozone, or smog, which can cause or exacerbate respiratory diseases, asthma attacks, and decreased lung function; in other regional haze actions, EPA has recognized that reducing nitrogen oxides emissions will reduce the incidence of asthma and other respiratory conditions. 78 Fed. Reg. 8,274, 8,292 (Feb. 5, 2013).

In light of these longstanding impacts, NPCA urges EPA to swiftly cure Bonanza's ongoing Clean Air Act violations by proposing a PSD permit for the plant without delay. We look forward to the opportunity to comment on the plant's imminent PSD permit.

Sincerely,

Suma Peesapati
Staff Attorney

Cc: Stephanie Kodish, NPCA