Deseret
Generation & Transmission Co-operative

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

February 26, 2002

Mr. Michael Owens
USEPA Region 8 (8P-AR)
999 18th Street, Suite 300
Denver, Co 80202

Re: Bonanza Title V Information

Dear Mr. Owens,
This letter is in response to your phone call of this morning asking Deseret to provide you with additional information regarding the Title V application. We talked about three areas that needed further clarification. Hopefully this letter will give you all the additional information you have requested.

First, a copy of the Bonanza fugitive dust plan is included as an additional attachment to the E-mail that a copy of this letter was attached to.

Second, Deseret has reviewed the requirements of 40 CFR Part 68 (Risk Management Plans). Our judgement is that none of Part 68 applies to the Bonanza Plant. The only Part 68 chemical at Bonanza that is above the Part 68 threshold is propane for which we are also exempt.

The third item was in regards to the applicability of 40 CFR 60, Subpart Y (Coal Preparation Plants) to the Bonanza Plant. Bonanza hasn't used the on-site the coal crushing equipment at the plant for many years, and so it wasn't a part of the Title V application. However, the Deserado Mine and the Bonanza Plant are in the process of making some operational changes that will require the plant to operate the on-site crushing equipment again on a full time basis. This operational change would require the on-site coal crusher to be added to the Title V permit. The crushing equipment is housed in an enclosed building with a fabric dust collector and a stack for the building.

If you have any questions on these three issues, please contact me.

Sincerely,

Howard Vickers

Howard Vickers
Environmental Supervisor

Cc: David Crabtree

DESERET GENERATION & TRANSMISSION CO-OPERATIVE

FUGITIVE DUST CONTROL PLAN
BONANZA POWER PLANT

1.0 INTRODUCTION:

The Bonanza Power Plant facility lies in a remote desert location 28 miles southeast of Vernal, Utah. Deseret Generation & Transmission Co-operative (Deseret) recognizes the importance of minimizing Fugitive Dust generated through its operation and its duty to protect the public health and welfare. Operating personnel and Contractor's are responsible for implementing, following, and documenting compliance with this Plan.

1.1 Purpose:

The Purpose of this Plan is to establish operating procedures and work practices to minimize Fugitive Dust. The primary Fugitive Dust sources are addressed in this Plan. The Owner believes this Plan represents feasible and economically reasonable methods to minimize Fugitive Dust at the Bonanza Power Plant.

1.2 Monitoring:

The Owner will conduct daily visual monitoring of each potential source of Fugitive Dust. Indicators of Fugitive Dust, which would trigger the next higher Control Measure (while appropriately considering meteorological conditions such as wind, humidity, temperature, etc.) may include:

a. Fugitive Dust does rise higher than axle height behind the vehicle traveling on the road.

b. Fugitive Dust from all other sources of Fugitive Dust (including haul roads not in use) does exceed the dust from similar natural terrain in adjacent areas.

The Owner is responsible to insure the appropriate level of Control Measures is in place. The first level of Control Measure describes the minimum level of Fugitive Dust control while the next levels describes Control Measures which are progressively more stringent. Control Measures may be increased or decreased to reflect current conditions and activities. Actions taken to implement the Fugitive Dust Control Plan shall be logged. The log will reflect whether the Control Measures have been increased or decreased and why.

1.3 Documentation:

Records documenting the Fugitive Dust Control Plan implementation shall be maintained on site. The Responsible Official will use these records to certify compliance with the requirement to minimize Fugitive Dust. Records are available to inspectors upon their request.

1.4 Source Information:

Deseret Generation and Transmission
Bonanza Power Plant
12500 East 25500 South
Vernal, Utah 84078

1.5 Process Description:

The Bonanza Power Plant is a coal fired electrical generating station. Coal is delivered to the site via train from the Co-operative's Deserado mine in Colorado and in some cases from the open market by truck. Coal is stored on the 22-acre storage pile and in the coal silo. All of the coal conveyors are covered and the storage pile is maintained by mobile equipment to minimize Fugitive Dust. Up to 2.2 million tons of coal are burned annually.

The byproducts of the plant are Fly Ash and Scrubber Sludge. Approximately 350,000 tons of these products may be produced annually. These products are transferred by covered conveyor and occasionally by tanker truck to the Sludge Landfill, which is maintained by mobile equipment. These coal combustion and cleaning byproducts have a commercial value and will sometimes be sold.

Limestone is used in the Sulfur Dioxide Absorption System. This product is stored in a pile until needed in the unit and is then transferred by covered conveyor. The limestone pile is maintained by mobile equipment.

2.0 POTENTIAL SOURCES:

Potential sources of Fugitive Dust at the Bonanza Power plant, are wind erosion on the coal storage, limestone storage, and sludge landfill piles along with movement of mobile equipment on the storage piles and on paved and unpaved roads.

3.0 WORK PRACTICES:

Safety considerations must be addressed when determining how best to go about minimizing Fugitive Dust. Furthermore, the Owner recognizes that there are periods of unusual weather events such as strong winds or periods of extreme cold when reasonable methods to control Fugitive Dust would not be successful. Under normal or typical circumstances the following Work Practices will be implemented to minimize Fugitive Dust.

Potential	Control Level	Control Measure
Paved Roads	1	Apply water to the roadway as needed
Haul Roads	1	Annual application of Crusting Agent
	2	Wash roadway with water truck
	3	Reduce vehicle speeds
Coal Pile	1	Apply water to the coal as needed
	2	Compact as needed
	3	Minimize activity on the Coal Pile
	4	Apply Crusting Agent as needed
Limestone Pile	1	Apply water to the Limestone as needed
	2	Compact as needed
	3	Apply Crusting Agent as needed
Sludge Landfill	1	Maintain byproduct moisture content
	2	Spray active areas with water cannons
	3	Soak active areas with the water truck
	4	Compact and cover with topsoil as soon as practicable

4.0 RECORDKEEPING:

Records will be maintained on site to demonstrate that the Fugitive Dust Control Plan is implemented and followed as described under Monitoring. Log sheets of control activities shall be maintained. This log is to include the date, time, operator name, location, and description of the dust control activity.

Records shall be maintained for a period of five years.

5.0 QUALITY CONTROL:

The Owner will conduct periodic inspections and evaluations of the Fugitive Dust Control Plan and the potential sources to insure the effectiveness of the plan.