June 13, 2014

Michael B. Owens, Air Program (8P-AR),
U.S. EPA, Region 8,
1595 Wynkoop Street,
Denver, CO 80202-1129

Re: Bonanza Power Plant Title V Operating Permit

Dear Mr. Owens,

Thank you for this opportunity to comment on whether the EPA should or should not approve a Title V permit for the Bonanza, Utah power plant.

First, I personally believe that all natural energy resources will be needed to for the people of the world and that the development of these resources, renewable or non-renewable, should always be done in a fashion that promotes the greatest efficiency and exhibit the least amount of environmental impact on the land. I have lived in Rangely over 50 years and I know that it is the people in Rangely and people in other rural communities, where they develop or extract energy, to be the true stewards of our public lands and the wildlife that shares the same space. We are the people that love the outdoors, we live amongst the wild, we play, hunt, and work in the most peaceful and beautiful areas in the country.

Why should the EPA approve a Title V Permit with the same environmental controls as the PSD Permit approved 15 years ago for the Bonanza Power Plant?

1. Bonanza Power Plant is CLEAN – forcing new upgrades isn't just unfair, it is wrong, it will cause absolute devastation to Rangely, Rio Blanco County, and the State of Colorado:
    a. Wild Earth Guardians does not have their facts straight; Bonanza Power Plant was rated as top 20 cleanest in 2002, other power plants were grandfathered in and have not upgraded in decades while Bonanza was constructed to meet or exceed all controls required like 100% scrubbed emissions, robust baghouse filtering, high-efficiency turbine rotator, new low-emitting burners, and the plant has a 600 foot emissions stack.

    b. Bonanza Power Plant already has an approved PSD permit from the EPA. EPA now claiming this PSD permit no longer qualifies or changing the requirements half way through a signed agreement is absolutely unacceptable! EPA has a contract in place with Deseret Power, the EPA needs to stand by it and not allow special interest groups like Earth Guardians to persuade otherwise.

c. Bonanza Plant is still one of the cleanest plants in region 8 and in the nation. Colorado holds the title of having the Cleanest Coal on the planet and has the lowest carbon emissions.

2. Increased Rates or shutting down the Bonanza Power Plant affect the Social Economics of the communities and power users of that plant:

   a. Deserado Mine in Rangely has not railroad access or other means to ship coal elsewhere so if Bonanza shuts down so does the mine.
      - Deserado Mine employs 165 and Bonanza Power Plant employees 105
      - Support of the Rangely Hospital in the amount of $308,638
      - Property Tax 43,620,183
      - Estimated Sales Tax $1,001,528
      - **Total Taxes of $12,838,956**

   b. If Bonanza is forced to upgrade the power rates could increase 40% or more, families and small business of the Town of Rangely cannot afford that increase causing absolute devastation across the region.

   c. Deserado Mine is a big contributor employer and if it shuts down it would mean loss of 165 jobs with 90-95 as residents of Rangely, which is significant to Rangely with a population of about 2400.

   d. Loss of people means loss of property taxes for Rio Blanco County, which would mean higher taxes, which will close more small businesses causing a ripple effect of devastation in all directions; to the towns Rangely and Meeker and throughout the State of Colorado.

   e. Rural energy developing communities are run and supported by the town and its special districts that all have tax based operating incomes. Hospitals, fire districts, ambulance service, schools, libraries, recreation districts, water districts, etc... without the tax base from Federal mineral Lease (FML) and Severance Taxes, property taxes, and other taxes, these districts would not survive, literally taking all public services out of commission.

For all of the economic devastation that a refusal to properly issue the Title V operating permit would wreak on the region, there is no justifiable, scientific basis for it. Colorado is renowned world-wide for our clean coal, which is very low in both mercury and sulfur content. The allegation that the Bonanza plant is somehow emitting tons of pollutants is demonstrably false. The Bonanza Power Plant was rated among the top 20 cleanest in 2002, and a 2013 Uintah Basin Ozone Study Prepared by researchers and air quality managers at Utah State University, University of Utah, National Oceanic and Atmospheric

Administration, ENVIRON, University of Colorado, Utah Department of Environmental Quality, stated that "The Bonanza power plant plume does not appear to contribute any significant amount of nitrogen oxides or other contaminants to the polluted boundary layer during ozone episodes." In addition, Bonanza was one of the first plants in the nation to adopt Best Available Pollution Controls, ahead of many other plants which were grandfathered in. In short, the Bonanza plant is a clean facility that is not creating air quality problems that would necessitate this action on the part of the EPA.

Why do the extremist litigation groups that misuse legislation to pursue an assault on middle class Americans by opposing any and all responsible energy development even have a right to create such havoc with their selfish agenda-driven lawsuits? Why doesn't the EPA, as a responsible agency of the federal government, stop being party to these egregious lawsuits that have no other effect than to hurt regular Americans by crippling our economy?

As a business owner and a longtime resident of the Town of Rangely, I ask the EPA to approve a Title V Permit for Bonanza Power Plant and insist the permit has the same controls and regulatory requirements of the PSD Permit already approved some 15 years ago. Any changes that cause the shutting down the power plant, or a change of the plants power base from coal to some other source would shut down the Deserado Mine of Rangely, CO; devastating our rural community's livelihood. It would create a downward spirally effect on the economy for us and the entire States of Colorado and Utah. For sure all small businesses that are users of the power the plant produces would suffer greatly for increased rates; many would close their doors.

My family certainly couldn't easily afford higher power rates and we are better off than most. The elderly on a set income of Social Security would definitely suffer because they won't be able to afford higher power bills.

Again, I insist that the permit be issued to Bonanza under the same conditions for which it was applied, and that the plant not be required to submit to onerous and unreasonable new restrictions and controls that will eliminate the livelihoods an financial security of hundreds of good people.

Sincerely,

Larry D. Hatch

Larry D. Hatch, Resident
Small Business Owner
Of Rangely, CO