Sevier County

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May 29, 2014

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

RE: Bonanza Title V Permit

Dear Mr. Owens:

As elected officials of Sevier County, we are seriously concerned over the proposal to reverse a 15-year old permit at the Bonanza Power Plant. We find it incredulous that agency personnel believe they can impose severe consequences on sensitive populations. Such impositions will cause a loss of respect and credibility for the EPA as they deal with future permits.

Sevier County has residents and businesses that are served by Garkane Energy. The proposed action would increase power rates to the point of being unbearable. To be specific, we submit the following reasons for maintaining the existing permit.

1. Sevier County has residents and businesses serviced by Garkane Energy and these residents would suffer the financial consequences of onerous and unnecessary regulations.

2. We already have struggling economies and increasing power rates by up to 40% would be unbearable and likely force some business closures.

3. The ironic consequence would be that more people would turn to burning wood to heat their homes during winter hours rather than rely on electrical systems.

4. What evidence exists that air quality related problems are present?

5. To undo a permit 15 years after its issuance injects so much uncertainty into capital markets that financing plants will become very difficult. Who would invest money into a generation facility knowing that the operation could stop whenever EPA employees decided it had made a "mistake"?

6. This appears to be more arbitrary and capricious than based on any evidence of a problem. Permits are issued under the assumption that the rule of law governs governmental actions.

7. This is another incident of the EPA's "war on coal" as previously demonstrated with other permits the EPA has reversed for coal related projects (i.e. Arch Coal)

8. Minority populations would be adversely affected.

This action is simply unnecessary and imposes undue burdens on economically sensitive populations and communities.

Sincerely,

Gordon W. Topham
Commission Chair

Gary B. Mason
Commissioner

Garth Odgen
Commissioner

cc: Utah Congressional Delegation