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Deseret
Generation & Transmission Co-operative

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

November 11, 1999

Ms. Ursula Trueman, Director
Utah Division of Air Quality
Department of Environmental Quality
P.O. Box 144820
Salt Lake City, Utah 84114-4820

Dear Ms. Trueman:

The UDAQ has been notified in the past that Deseret is in the process of changing some of the operating systems at the Bonanza Plant. The installation of the new ruggedized rotor and the rebuild and upgrade of the current pulverizers are the two main changes taking place that we have reviewed with your office. These Changes will take place during the spring outage next year.

Another one of the systems that will be changed out during the spring outage will be the digital control system (DCS) for the boiler and turbine controls. The boiler/turbine DCS replacement is part of a two-phase DCS changeover at the Bonanza Plant. Phase one of the DCS project covered the areas outside the boiler/turbine such as the scrubber/baghouse, the raw water system and the sludge handling systems. Phase one is largely complete.

The DCS systems at the Bonanza Plant needed changing due to their age, the increased difficulty in maintaining them and the probability of increased failures of the system in the future. The new DCS is replacing the Westinghouse 7300.

The UDAQ was not notified of the change of the DCS system because the new systems will modernize and increase the efficiency of the controls at the plant, but not increase the efficiency of the combustion process, plant operations or extend the life of the plant.

In light of recent issues that EPA has raised at other utilities regarding the question of equipment replacement, Deseret wants to make sure that the UDAQ is fully aware of this project. Also, Deseret would like the UDAQ to agree that since no plant combustion or operating efficiencies are involved, that this DCS project does not meet any new source review criteria.

Deseret would like a reply to this letter as soon as possible so we can move ahead with the DCS changeover. We appreciate working with you and your staff on all these issues.

Sincerely,

Stan Gordon
Plant Manager

Cc: Mike Owens, EPA Region VIII
David Crabtree, Deseret G&T
Robert Strole, Deseret G&T