DESERET POWER
ELECTRIC COOPERATIVE

12500 East 25500 South
Vernal, Utah 84078
(435) 789-9000 Fax: (435) 781-5816

January 27, 2014

Mike Owens
USEPA Region 8
1595 Wynkoop Street
Mail Code: 8P-AR
Denver, CO 80202-1129

Re: Bonanza Power Plant Unit 1 – Fugitive Emissions Dust Control Plan

Dear Mr. Owens,

Pursuant to paragraph 36 of the Bonanza Power Plant Unit 1's PSD permit, we are required to provide the EPA with a copy of the most current Fugitive Emissions Dust Control Plan within 90 days of a revision date. Enclosed is a copy of the most current plan (revision date, January 27, 2014).

Please let me know if you have any questions. I can be reached at 435-781-5706 or eolsen@deseretpower.com.

Sincerely,

Eric C. Olsen
Environmental Superintendent
Enclosures (2)

cc: David Crabtree (Deseret Power)

DESERET GENERATION AND TRANSMISSION CO-OPERATIVE
BONANZA POWER PLANT UNIT 1
FUGITIVE EMISSIONS DUST CONTROL PLAN

I. Purpose

The Bonanza Power Plant Unit 1 (Bonanza) is located in a remote desert location approximately 28 miles southeast of Vernal, Utah. Deseret Generation and Transmission Co-operative (Deseret) is the owner and operator of this unit. They recognize the importance of minimizing fugitive dust to protect the public health and welfare. Plant personnel and contractors are responsible for implementing, following, and documenting compliance with this plan. All fugitive dust must not exceed 20% opacity, measured visually by EPA Method 9.

The purpose of this plan is to establish operating procedures and work practices to minimize fugitive dust at Bonanza. The major sources of fugitive dust at Bonanza are addressed in this plan. Deseret believes this plan is feasible and economically reasonable to minimize fugitive.

II. Source Information

Deseret Generation and Transmission Co-operative
Bonanza Power Plant Unit 1
12500 East 25500 South
Vernal, Utah 84078
Phone: 435-789-9000

III. Process Description

Bonanza is an approximate 500 megawatt gross, coal fired electrical generating unit (EGU). Coal is delivered to the site by train from Deseret's Deserado mine near Rangely, Colorado. On occasion, coal is purchased on the open market and delivered by truck. Coal is stored on a 22-acre (footprint) storage pile. The active reclaim area of this pile must not exceed 11 acres, but the reclaim area may be moved to any location on the pile. The other 11 acres will be considered in long term storage. The long term storage area will be compacted and sealed with a surfactant initially. Subsequent application of a sealing agent will be applied as needed. The coal storage pile is maintained by mobile equipment. All of the coal conveyors are covered to minimize fugitive dust.

Limestone is used in the SO_2 scrubber and is stored on site in a pile(s). It is conveyed into the scrubber by a covered conveyor. The limestone storage pile(s) is maintained by mobile equipment to minimize fugitive dust.

The byproducts of the plant are fly ash, bottom ash, and scrubber sludge. Fly ash and

scrubber sludge are mixed together and are transferred by a covered conveyor to the fly ash/sludge landfill. This product is moist yet dry enough it will not liquefy on the belt as it is transported to the fly ash/sludge landfill. Occasionally, this product is trucked to the fly ash/sludge landfill during an equipment malfunction. The fly ash/sludge landfill is maintained by mobile equipment. The bottom ash is trucked to the bottom ash landfill and maintained by mobile equipment.

IV. Major Sources of Potential Fugitive Dust

Major sources of potential fugitive dust at Bonanza due to wind errosion and/or mobile equipment motion are:

1. Coal storage pile
2. Limestone storage pile(s)
3. Fly Ash/Sludge landfill
4. Bottom ash landfill
5. Unpaved roads

V. Work Practices

Safety considerations must be addressed when determining how best to go about minimizing fugitive dust. Furthermore, Deseret 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, Table 1 shows the work practices that will be implemented to minimize fugitive dust. If a chemical treatment is going to be used, the plan must be approved by the EPA before application.

Table 1, Potential Sources & Control Measures

Potential Sources	Control Level	Control Measure
Coal Pile	1	Apply water as a dust suppressant
	2	Compact material
	3	Minimize activity
	4	Apply a chemical dust suppressant, as needed
Limestone Pile(s)	1	Apply water as a dust suppressant
	2	Compact material
	3	Minimize activity
	4	Apply a chemical dust suppressant, as needed
Fly Ash/Sludge Landfill	1	Maintain product's moisture content
	2	Spray active areas with water cannons
	3	Spray active areas with the water truck
	4	Compact and cover with topsoil as soon as practicable
Bottom Ash Landfill	1	Apply water as a dust suppressant
	2	Compact material
	3	Minimize activity
	4	Apply a chemical dust suppressant, as needed
Unpaved Haul Roads	1	Apply water as a dust suppressant
	2	Compact material
	3	Minimize activity/reduce vehicle speed
	4	Apply a chemical dust suppressant, as needed
Unpaved Operational Areas	1	Apply water as a dust suppressant
	2	Compact material
	3	Minimize activity/reduce vehicle speed
	4	Apply a chemical dust suppressant, as needed

Deseret personal are responsible to insure the appropriate level of control measures. The first level of control (1) describes the minimum level of control for fugitive dust. The next levels (2 thru 4) describe control measures that are progressively more stringent. Control measures may be increased or decreased to reflect current conditions and activities.

VI. Monitoring

Deseret will visually monitor potential sources for fugitive dust during daylight conditions if the 20% opacity level is in jeopardy of being exceeded. Control levels will be increased by one level or degree if the 20% opacity level is exceeded for a period of at least three (3) consecutive six-minute intervals. Thereafter, and continuing until the

opacity level less than 20% is sustained for at least two (2) consecutive six-minute increments, the control level will increase by one level (up to control level 4) if opacity of at least 20% persists for a period of at least five (5) consecutive six-minute intervals after the previous control level increase. Meteorological conditions such as wind, humidity, temperature, etc. should be considered during visual monitoring. Deseret maintains a group of employees who are EPA, Method 9 certified for measuring opacity visually. These employees are responsible for the continuous visual monitoring and for plan compliance at Bonanza.

VII. Recordkeeping

Records will be maintained on site to demonstrate control measures in compliance with this plan and the Prevention of Significant Deterioration (PSD) permit. The records will include the control level, general notes, location (if necessary), weather conditions, wind conditions, surface conditions, compacting material (yes/no), and if water was used as surfactant. When any kind of chemical treatment (stabilization work) is done, a record/log must be kept that includes the dates, type of agent applied, amount applied and area of application.

Bonanza will use these records to certify compliance with the fugitive dust requirement in the PSD permit. Records are available upon request and will include a period of two (2) years ending with the date requested.

VIII. Quality Control

The coal unloading track hoppers will be inspected monthly to ensure the dust suppression system is operational. This inspection will be performed only during months with above freezing temperatures. A record will be kept of these inspections. Any work orders on the system will be completed in a timely manner.

Those employees who are EPA, Method 9 certified will review this plan annually. They will also maintain a current certification.

Deseret will conduct an annual review (completed before February 2) of this plan and potential sources to maintain PSD permit compliance. If revisions are made to this plan, a revised copy will be submitted to the EPA within 90 days of the revision date.