

March 26, 2012

Re: Docket ID No. EPA-R10-OAR-2011-0367

To whom it may concern:

I am writing on behalf of Denali Citizens Council to express concerns and questions related to the Alaska Regional Haze State Implementation Plan (SIP). DCC is a grassroots 501(c)(3) conservation organization with over 300 members who live primarily in the Denali Borough and who are concerned with public policy related to both the local community and Denali National Park and Preserve. Denali provides outstanding wilderness opportunities, including premiere views of North America's tallest peak and visibility unparalleled in other areas in Alaska and the United States. The opportunities in Denali are world-renowned, and DCC supports the Regional Haze rule and its efforts to preserve the superlative viewsheds that can be found in Denali National Park and Preserve. Thank you for considering our comments.

The SIP fails to adequately address the shutdown dates required as part of the Best Available Retrofit Technology (BART) determination for Golden Valley Electric Association's (GVEA) Unit #1. When GVEA suggested in comments that a shutdown date was not required for Unit #1, the state responded that, "If circumstances change and it makes sense to operate Healy Unit I beyond 2024, the Department will evaluate the situation at that time." This SIP should make clear that a shutdown date of 2024 is a requirement for Unit #1 (without further review and determinations as part of the Regional Haze Rule), as the state has asserted that it cannot require such a shutdown date in current air quality permits. BART guidelines require that if a shutdown date "affects the BART determination, this date should be assured by a federally- or State-enforceable restriction preventing further operation." This requirement is not addressed in this SIP, and Unit #1 shutdown requirements should be formally addressed here.

While Healy Coal Plant's Unit #2 (i.e. "Healy Clean Coal Plant") is not currently operating, it is inadequate to delay discussion of controls and mitigations related to the plant's opening and its impacts to regional haze. This SIP acknowledges great impacts to regional haze from Unit #2 operations but fails to consider what mitigations and controls are necessary to preserve visibility in Denali's Class I Airshed if Unit #2 were to begin operations. While the state is adamant that Unit #2 operations would be not be a major modification of the plant (requiring further review under the Regional Haze Rule), they refuse to consider the permitted emissions from this plant as part of this SIP, as if it does not exist. The SIP states that *"If brought on line, the point source NOx emitted within the Denali Borough would increase by a factor of 4.0 and the Sox would increase by a factor of 2.8 (based on permitted not actual emissions). This increase would make the Denali Borough the largest sources of anthropogenic emissions and the second largest source of all emissions impacting the Denali monitors."* Contradicting the clear impact to visibility acknowledged in this statement, the SIP further states that *"Since many of the coal fired*

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boiler control options considered in the four-factor analysis have already been implemented at this facility, the modeling results provide conflicting views of the potential impacts and the facility has an active permit, as a result ADEC is not mandating additional controls prior to startup through this SIP.” Considering the proximity to Denali’s Class I airshed, it is crucial that the state consider the impacts of Unit #2’s “restart” (and appropriate mitigations and controls associated with long-term strategies and reasonable progress goals) in its Regional Haze SIP, or in air quality permits, prior to the plant’s operation.

While it appears that this SIP equally considers data from both the Denali Headquarters and Trapper Creek monitoring sites, it does not explicitly state that this is the case. The SIP describes the Denali Headquarters IMPROVE site as now a “protocol site” (and “originally the IMPROVE site”) but does not define the difference between a protocol and primary site, or whether data from a primary site would be given preference over a protocol site. Monitoring pollutants affecting visibility in Denali should not only (or primarily) consider pollutant information south of the Alaska Range, displaced from major sources of pollutants such as the adjacent Healy Coal Plant and nearby Fairbanks-area sources. The SIP should clearly state that data from both monitoring sites will be given equal consideration in the future and should clarify how (or whether) data from primary versus protocol sites would be considered. The Denali Headquarters site is the only monitoring site in the entire state that included data for all of 2000-2004, and data from this site extends over a longer period of time (beginning in 1988) than other sites, making it a valuable source for continued data collection and monitoring. Also, the Denali Headquarters site is located on the northern side of the Alaska Range, and along the Denali Park Road. Using data from Trapper Creek (on the south side of the Alaska Range, over 100 miles from the Park Entrance area, and far from Interior Alaskan pollutants that affect the north side of the Range) alone or primarily is inadequate.

It is unclear whether this SIP fully reviews and addresses all options for control of anthropogenic pollutants that impair visibility in Denali’s Class I Airshed. For example, while the SIP references coal combustion as a source of Organic Matter Carbon (OMC) and Elemental Carbon (EC), it attributes all OMC and EC in the Denali region to wildfires. Considering that OMC and EC are present year-round, it’s unclear why the state has avoided mention of OMC and EC’s relationship to the Healy Coal Plant (including ash byproduct) and combustion related to power generation and home heating in and near the Denali Borough. Instead the SIP suggests that the OMC and EC found in Denali during winter months originate overseas. This SIP should acknowledge the presence of OMC and EC from anthropogenic sources in and near the Denali Borough (and within the state), and should consider methods to control OMC and EC pollutants related to anthropogenic sources.

In general the SIP does little to address additional emissions that are reasonably foreseeable. A number of industrial developments are currently moving forward in the Denali region, and are not even mentioned in this SIP. Some foreseeable projects include the Eva Creek Wind Project (construction currently underway), the Alaska Stand Alone Pipeline (Environmental Impact Statement currently under consideration, work projected to begin in 2016 and continue through 2019), the Nenana Basin gas exploration (currently licensed for exploration with anticipated developments in the near future), and the Healy Basin gas exploration (permitted in 2011, but currently under appeal in the Alaska Supreme Court). In particular, gas development activities in

other areas of the country have created significant air pollution problems for both local communities and national parks. The construction activities should also be considered by this SIP, especially regarding cumulative impacts and appropriate mitigations and controls associated with long-term strategies and reasonable progress goals. At a minimum, the SIP should address how it will deal with future emissions and construction activities occurring prior to the SIP's next review phase that would affect Denali's Class I Airshed. It is not prudent to delay this planning to the future.

Thanks again for the opportunity to comment on Alaska's Regional Haze State Implementation Plan.

Sincerely,

/s/ Hannah Ragland, on behalf of the Denali Citizens Council Board of Directors