

Debra Dalcher, Operating Permits Supervisor
Alaska Department of Environmental Conservation
619 East Ship Creek Avenue, Ste 249
Anchorage, AK 99501

December 4, 2009

ADEC proposal to renew Air Quality Control Operating Permit No. AQ0173TVP02 to the Golden Valley Electric Association, Healy Power Plant.

Dear Ms. Dalcher,

On behalf of the board and staff of the Denali Citizens Council, I would like to express our disappointment that the state has not required a PSD as part of the process of granting a Title V Air Quality Control Permit to Golden Valley Electric Association for the operation of Healy 2 "Clean Coal" power plant.

The Denali Citizens Council, a local education and advocacy organization, has been involved in the decision process around this plant since the early 1990s. We are not in complete opposition to a new coal fired power plant in Healy, despite its obvious negative contributions to air quality and carbon pollution world-wide. Instead, we support the most up-to-date and inclusive permitting, taking into account more modern notions of what constitutes pollution, including more newly recognized pollutants such as carbon and mercury. The PSD process would have been ideal for reviewing the technology and determining its efficacy in addressing current standards. We are disappointed that this has not, as yet, been deemed necessary.

I can tell you unequivocally that GVEA closed Healy 2 and it has been closed for 10 years. Until last year, GVEA indicated that they had no intention of running this plant and described it as unworkable. Such closure is, to our way of thinking, an automatic PSD trigger. We have signed on to more detailed comments on this issue elsewhere, and we intend to maintain our place at the table as a local organization concerned with the air quality in Healy and in the wider region, which includes the Class 1 Airshed of Denali National Park.

In winter, the air is often dense with the smell of coal smoke from home heaters, used because of easy access to coal at Usibelli Coal Mine. Because the Denali Borough has no role in regulating air quality, there is no legal framework, at present, for monitoring particulate matter and other pollutants for determination of the current and ongoing quality of air in Healy. If GVEA plans to use Healy for the purpose of upping its generating capacity, it should be required to commit to helping that community reduce the impact of coal fired home heaters on local air quality. GVEA should be required through public education projects and installation incentive programs to assist locals clean up local air. ADEC, for its part, should commit to ongoing monitoring and a role in protecting the overall air quality in an area where cheap coal contributes to its unregulated use in home heaters.

We ask, also, that ADEC require GVEA and Usibelli to partner in providing education on the health effects of coal burning, using such venues as the local school and community center. The advantages of coal burning from a jobs and energy cost standpoint MUST be balanced with its overall, and well known, negative effects on air quality.

Sincerely,



Nancy Bale, President
Anne Beaulaurier
Jean Balay
Cass Ray

Charlie Loeb
Nan Eagleson
Hannah Ragland
Jared Zimmerman

Julia Potter, Community Organizer