



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE

Air Resources Division

P.O. Box 25287

Denver, CO 80225



December 6, 2010

N3615 (2350)

Scott Sloane
Division of Air Quality
Alaska Department of Environmental Conservation
410 Willoughby Avenue, Suite 303
P.O. Box 111800
Juneau, Alaska 99811-1800

Dear Mr. Sloane:

The National Park Service received notice on October 26, 2010 that the Alaska Regional Haze State Implementation Plan (SIP) was released for public comment. We appreciate the opportunity to review the revised plan. Alaska Department of Environmental Conservation (ADEC) has been responsive to many of our comments on the earlier draft plan. We have three concerns that we would like to bring to your attention as you finalize the regional haze plan.

- As stated in sections III.K.7 and III.K.9, the Golden Valley Electric Association (GVEA) Healy Power Plant Unit 2 would significantly increase NO_x and SO_x emissions affecting Denali National Park & Preserve if brought online as planned by GVEA. Since Unit 2 emissions are not currently accounted for in the Weighted Emissions Potential (WEP) analysis, an acceptable alternative is for ADEC to address Unit 2 emissions in the regional haze five-year reviews and other SIP documents once the plant is brought online, as described in section III.K.10. We recommend, however, that ADEC consider future Unit 2 emissions and implications for regional haze reasonable progress goals during the Title V permit renewal process before Healy Unit 2 is brought online.
- In the Alaska Regional Haze Plan Response to Federal Land Manager Comments (Appendix III.K.11.b), ADEC indicates that under Alaska state statutes, it is not possible to mandate an enforceable shutdown date for Healy Unit 1 beyond the duration of the current operating permit. We continue to maintain that an enforceable shutdown date for Healy Unit 1 by 2024 is a requirement of the BART guidelines (40 CFR 51, Appendix Y, Section IV.D.4.k.2), since the final BART determination report demonstrates that comparisons among evaluated control options were based on an 8-year remaining useful life for Healy Unit 1 beyond 2016. ADEC must either find a way to incorporate an enforceable shutdown date into the final regional haze SIP, or make a revised BART determination that is not based on an 8-year

remaining useful life for Unit 1. If the Alaska Regional Haze SIP is finalized and approved without an enforceable shutdown date for Unit 1, and the plant is still operating in 2019, the next subsequent Title V renewal permit should include language stipulating that Healy Unit 1 will not operate beyond 2024.

- We agree with the approach that ADEC has taken to use IMPROVE data from both the Denali headquarters and Trapper Creek monitoring sites to monitor progress under the Regional Haze Rule. However, we still assert that the Denali site near park headquarters is an official IMPROVE monitoring site, not an IMPROVE protocol site.

Thank you for the opportunity to participate in ADEC's regional haze planning. We ask that you continue to involve the Federal Land Managers in your future planning to protect visibility in our national parks and wilderness areas. If you have any questions regarding our comments, please contact Pat Brewer of my staff at (303) 969-2153.

Sincerely,



John Bunyak
Acting Chief, Air Resources Division

cc:

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