

Golden Valley Electric Association (GVEA)
Comments Addressing National Emissions Standards for Hazardous Air Pollutants:
Coal- and Oil-Fired Electric Utility Steam Generators – Reconsideration or Supplemental
Finding and Residual Risk and Technology Review
Comment Solicitation Category C-2

On February 7, 2019, the U.S. Environmental Protection Agency (EPA) published a notice in the Federal Register (Vol. 84, No. 26) proposing a revision to the EPA response to the U.S. Supreme Court decision in *Michigan v. EPA*. That decision held that EPA erred by not considering cost in this determination that regulation under section 112 of the Clean Air Act (CAA) of hazardous air pollutant (HAP) emissions for coal- and oil-fired electric utility steam generating units (EGUs) is appropriate and necessary. Among other issues, EPA is soliciting comment on whether EPA "has the authority or obligation to delist EGUs from CAA section 112(c) and rescind (or to rescind without delisting) the National Emission Standards for Hazardous Air Pollutants (NESHAPS) for Coal- and Oil-fired EGUs, commonly known as the Mercury and Air Toxics Standards (MATS)." The MATS rule is provided under 40 Code of Federal Regulations (CFR) 63 Subpart UUUUU.

In response to this solicitation, GVEA is requesting that MATS be rescinded as applied to the Healy Power Plant, specifically the Foster-Wheeler coal-fired boiler identified as Emissions Unit (EU) ID 1 in Air Quality Operating Permit No. AQ0173TVP03 and the TRW Integrated Entrained Combustion System, pulverized coal-fired steam generator with Joy activated recycle spray dryer absorber and Joy pulse jet fabric filter, identified as EU ID 2 in Air Quality Operating Permit No. AQ0173TVP03. These two EGUs are the only MATS-affected boilers in Alaska. Additional information supporting this request is provided below.

GVEA is a member-owned electric cooperative headquartered in Fairbanks, Alaska. Recognizing GVEA's importance to the economic environmental and social viability of our communities, the Cooperative's mission is to safely provide its member-owners with reliable electric service, quality customer service and innovative energy solutions at fair and reasonable prices. GVEA owns and operates the Healy Power Plant located near Healy, Alaska.

As noted above, the Healy Power plant includes two coal-fired EGUs as the primary generating units. EU ID 1 is a Foster-Wheeler pulverized coal-fired boiler constructed in 1967. Certain emission control equipment upgrades were made to EU ID 1 per the stipulations in Consent Decree (CD) Civil Action No. 4:12-ev-00025-RRB dated November 19, 2012 and amended on August 8, 2017. Included in these upgrades were the installation of a selective non-catalytic reduction (SNCR) system for nitrogen oxides (NO_x) emissions control and a particulate matter (PM) continuous emissions monitoring system (CEMS) for determining PM emissions compliance.

The second Healy Power Plant primary power generating unit is EU ID 2, formerly known as the Healy Clean Coal Project (HCCP). EU ID 2 was installed in 1996 and first operated in 1997 and 1998. Operation of EU ID 2 was then suspended for approximately 15 years. During that