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From: Ross Adkins <<u>rossadkins1@reagan.com</u>> Subject: Sip Fairbanks Date: June 10, 2019 at 4:53:51 PM AKDT To: <u>dec.air.comments@Aalaska.gov</u>

To Dec SIP Authors,

I am concerned that EPA coal power plant near future regulations (sulfur and nitrate in particular) will force economic failure of the Aurora power plant which provides steam and hot water heat for the major portion of downtown Fairbanks, resulting in a higher pollution level at breathing level than exists now. The power plant at Fort Wainwright is also jeopardized by the impending regulation and would add greatly to the area emissions should it be closed. These two plants along with the UA new plant and Eielson are unique in the US, in that they have a much higher efficiency in energy production (MBTU output/MBTU input, heat and power) and in particulate emissions (pounds/MBTU output). For clarity to the layman, these numbers should be accurately calculated and stated in MBTU input to MBTU output (including the numbers for electricity and heat), and pounds of emissions to MBTU output (p/MBTU). The same numbers should be calculated for the oil turbines operated by GVEA in the area. Because of combined heat and power, and the point of emission, the coal plants are more efficient in both the economic factors and the pollution factors. The numbers should be accurately calculated and presented to the public in the SIP. For comparison by the layman, the efficiency, and pollution in pounds per mbtus, should be shown for the normal oil fired home heaters used in Fairbanks. There is considerable new data that "Chemical feedbacks weaken the wintertime response of particulate sulfate and nitrate to emissions reduction " (www.pnas.org/cgi/doi/10.1073/pnas.1803295115). I believe that we will not gain control of particulates in North Pole until the use of ULSF or natural gas is predominately used there. I look forward to natural gas, but believe that number 1 and number 2 oil will eventually be eliminated from use by the same reasoning and regulation that eliminated lead in fuel. Sulfur is a much more toxic substance than wood particulates. We should do it now. There is some concern that supply of ULSF is so limited that new plants would have to be built. I note that hauling ULSF (1600m round trip) to the North Slope hyperventilates the environment, in other words, it creates more pollution and risk than it saves. Allowing North Slope operations to use No. 1 and No. 2 and using the ULSF in Fairbanks would be a very positive step, if it could be arranged by DEC, EPA and the oil companies. It would reduce oil operations cost and result in more money to the state. It would also help relieve shortage of ULSF for use in the state where it is needed most.

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