From: Russell Nelson
To: DOH, Air Quality
Subject: Regional Haze Public Comments
Date: Wednesday, May 18, 2022 9:50:03 AM

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Dear Director Glatt,

Having worked for 28 years as an engineer in ND's largest power plant, Coal Creek Station, I spearheaded projects that included world class leakage limitation from their waste disposal sites. I also spearheaded beneficial use of the fly ash as a replacement for Portland Cement (the calcining of which produces about one ton of CO2 for every ton of cement).

I am writing to you as a supporter of abundant, balanced, reliable, low-cost energy. A diverse set of energy resources is crucial for our region, and coal-based electricity must continue to be part of the equation. I support retaining coal as a regional energy source that will help keep electric rates low, jobs plentiful, and our economy robust. Coal has been and will continue to provide the source for power we can depend on.

More importantly, North Dakota's coal industry is a good neighbor. In accordance with DEQ's visibility plan, the industry has significantly invested in its power plants over the last decade to ensure the state continues boasting the cleanest air in the country. These investments reduced emissions by 66% and put the state well ahead of the path to eliminating visibility impairment in its parks by 2064-the goal set by the United States EPA.

State researchers report that wildfires and international emissions are the primary causes of visibility impairment. In 2020, North Dakota experienced long episodes of visibility impairment throughout summer and fall due these emissions, which the state cannot control. Due to the continued drought in far western regions, state experts believe this trend could continue. Costly new regulations imposed on power plants will not address this concern-instead, resources should be dedicated to reducing the fires that are the source of the haze.

I understand DEQ may be under pressure to impose new controls on power plants, even though power plants are not the primary cause of visibility impairment and new controls would not meaningfully improve visibility. Therefore, I urge support for the implementation plan developed by the North Dakota Department of Environmental Quality (DEQ) that ensures our region continues to benefit from clean and clear air along with reliable, affordable electricity supply, today and in the future.

Sincerely,

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