

1 **NORTHWEST PUBLIC POWER ASSOCIATION**

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3 **31-07 ARCHIVED RESOLUTION**

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5 **SUPPORT OF ALASKA COAL FUEL AND**  
6 **MERCURY CONTENT WAIVERS**  
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8 The Northwest Public Power Association (NWPPA) requests that  
9 Alaska be removed from the unjustified imposition of and impact from  
10 the provisions of new restrictions in the use of coal as fuel, especially  
11 regarding the Mercury content of coal, as discussed in 40 Code of Federal  
12 Regulation (CFR) 60 Subpart HHHH (Emission Guidelines and  
13 Compliance Times for Coal-Fired Electric Steam Generating Units).  
14 Alaska should be removed from this program because, as the  
15 Environmental Protection Agency (EPA) states in the reconsideration  
16 notice for the December 2000 Regulatory Finding for 40 CFR Part 63,  
17 also dated October 28, 2005, "EPA does not reasonably anticipate the Hg  
18 emissions from units located in Alaska, Hawaii, and the U.S. Territories  
19 pose hazards to public health."

20 Although there may be justified reasons for this mandate in the  
21 other states, the imposition of this requirement in Alaska is not justified  
22 because of the open spaces, lack of dense industrial or transportation  
23 base, and absence of spot congestion causing adverse health effects from  
24 fuel systems exhaust as is sometimes found in the rest of the U.S.

25 In addition, the natural occurrence of great quantities of coal in  
26 Alaska may provide the state and nation with a strategic energy resource  
27 that should not be unjustifiably encumbered.

28 If EPA decides not to remove Alaska from the Subpart HHHH  
29 program, NWPPA requests that EPA increase the Alaska state-trading  
30 budget to provide for anticipated growth in electrical generation capacity  
31 in Alaska.

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33 Origination Date: 2-2006 at the request of Alaska Power Association, AK  
34 (Contact: TC Wilson) Changes by Meera Kohler at 3-9-06 GRC meeting