



REGIONAL HAZE

Background

Section 169 of the Clean Air Act was enacted to establish a national visibility protection goal. It calls for the U.S. Environmental Protection Agency (EPA) to establish rules to ensure reasonable progress toward meeting this national goal. It gives states the primary authority to implement the visibility protection requirements through State Implementation Plan (SIP). The EPA's role is to provide oversight and assume authority if a state's plan is inadequate. The goal of regional haze regulation is to improve visibility in Class I areas, such as national parks and wilderness areas. It is not a health-based requirement.

In February 2010, the North Dakota Department of Health (NDDH) adopted its SIP wherein it determined the best available control technology (BACT) emission limits for affected North Dakota sources including Coal Creek Station.

On Sept. 21, 2011, EPA published its proposal to approve part of North Dakota's SIP but override certain aspects regarding the implementation of regional haze regulations for several power plants with respect to NOx, including Coal Creek Station (EPA's Federal Implementation Plan or FIP). On March 2, 2012 EPA announced its final FIP which includes a more stringent requirement than the SIP for NOx emissions from Coal Creek Station.

How it Affects Great River Energy

EPA's FIP includes a lower NOx emissions limit for Coal Creek Station units. In its SIP, North Dakota determined the necessary NOx reductions would be achieved at Coal Creek Station as a result of Great River Energy's DryFining™ system and the installation of further traditional controls. After investing \$270 million into the first-of-its-kind technology, the plant has seen significant reductions across the spectrum of emissions including 40 percent for SO₂ and 20 percent for NOx.

Great River Energy's Position

North Dakota's SIP was crafted after years of careful consideration of the statutory factors and a thorough technical review, while taking into account public comments. EPA has proposed an emissions limit that would require the use of selective non-catalytic reduction (SNCR) technology at Coal Creek Station. Because NOx emissions from Coal Creek Station have already been significantly reduced as a result of the DryFining installation, SNCR would have minimal impact on visibility and is not a cost-effective technology. In fact, extensive modeling shows that the installation of SNCR on Coal Creek Station units will have such an insignificant improvement in visibility that it will be far less than what EPA has determined is even perceptible to the human eye.

Great River Energy is continuing to work with North Dakota Department of Health to affirm the SIP and address the concerns EPA raised in its FIP.

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