

September 19, 2012



Montana Department of Environmental Quality,

Please accept these comments on behalf of the Helena Hunters & Anglers Association regarding the proposed Air Pollution Permit pending for Pennsylvania Power and Light's Colstrip Power Plant. The Helena Hunters and Anglers Association is dedicated to protecting and restoring fish and wildlife to all suitable habitats, and to conserving all natural resources as a public trust, vital to our general welfare. One of our primary concerns is consequences of coal burning on climate change and thus wildlife habitats across Montana.

We are concerned that the proposed permit will not protect Montana's air quality and therefore its environment, its wildlife, and its citizens. This is especially disturbing given the fact that the Colstrip plant is the largest pollution source in Montana. At a time when air quality has become a crucial matter in our state and nation, it is imperative that one of the dirtiest coal-fired generating stations in the nation be compelled to function within known standards for clean air. After all, we in Montana don't want to own the moniker, *The Big Dirty Sky State*. Nor do we want the health implications that comes with exposure of plants, animals and humans to acid gases, nitrogen oxide, sulfur dioxide, mercury, and particulates.

We expect that the Montana Department of Environmental Quality to live up to its name of ensuring Environmental Quality, and issue a permit that actually guarantees clean air protection. Currently the proposed permit will not guarantee that the enormous air pollution emissions from Colstrip will be within the limits established by law.

As such, please require compliance with the Environmental Protection Agency's new standard for sulfur dioxide. Within the permit, please establish one-hour emission limits to ensure that Colstrip's sulfur dioxide emissions are not endangering the health of people living and working downwind of the plant. Please also require monitoring that ensures continuous compliance with health-based limits for harmful particulate pollution. Incorporate the EPA's recently adopted air pollution limits for Colstrip's nitrogen oxides and sulfur dioxide emissions to limit Colstrip's impairment of visibility at national parks and wilderness areas. And finally, please incorporate the newly adopted federal limits and monitoring requirements for hazardous air pollutants—including mercury, acid gases, and metallic hazardous air pollutants.

While information is less abundant on the impacts of the various pollutants coming from the Colstrip plant upon wildlife and plant life (the environment downwind from Colstrip and the implications to climate change everywhere), the detrimental impacts relative to humans is well understood and must, in all good conscience, be addressed to the best of your ability within the new proposed air quality permit for PPL Montana's Colstrip coal-fired generation plant is issued.

Sincerely,

Stan Frasier, President
Helena Hunters & Anglers Association
219 Vawter Street
Helena, MT 59601