



Ashland Bayfield Counties
LEAGUE OF WOMEN VOTERS

PO Box 175
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Megan Corrado
Wisconsin Department of Natural Resources
Bureau of Air Management
101 S. Webster Street
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Madison, WI 53707-7921

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Air Pollution Control Construction Permits Nos. 18-MMC 168 & 169
Nemadji Trail Energy Center (NTEC), Superior, Wisconsin

Dear Ms. Corrado:

The Ashland Bayfield Counties League of Women Voters appreciates this opportunity to comment on the above-referenced permit applications. Ever since it began its study of air pollution in 1970, the League of Women Voters has worked for full implementation of the Clean Air Act, including the prevention of significant deterioration program to protect air in relatively clean-air areas like Northwest Wisconsin, and the application of best available control technology requirements to help cities like Superior deal with air pollution problems.

This proposed natural gas plant, while preferable to a coal-fired power plant, would not be a clean source of electricity, and we strongly believe that the permits, if they are issued at all, should not be issued without:

- 1) confirmation of the applicant's decision to switch from a water-based cooling system to air-cooling,

- 2) requirements for state of the art control of emissions of sulfur hexafluoride, an extremely potent greenhouse gas, from the electrical switch gear,
- 3) conditions calling for the monitoring and repair of leaks of, e.g., methane (a potent greenhouse gas), from the piping system that serves the combustion turbine, the boiler, natural gas preheating heaters, and space and water heating,
- 4) allowing the use of diesel oil only during periods of natural gas curtailment or when the facility is conducting required emissions testing,
- 5) control requirements to minimize fugitive dust emissions from the facility, and
- 6) consideration of the environmental justice implications of locating this pollution source in an economically disadvantaged neighborhood.

We understand these concerns have been more-fully described in comments submitted by others with an advanced technical understanding of these permits.

Aside from these specific concerns, however, we question the justification for constructing the proposed NTEC facility at all, given the recent proliferation of renewable energy sources in this part of the state. Indeed, Northwest Wisconsin has seen a dramatic increase in solar energy installations in the past several years, and with the trend continuing, it is entirely possible that the NTEC plant would be an obsolete and unneeded dinosaur not long after it goes on line. We are coming to realize, as we face more than one global crisis, that it is time to leave fossil fuels behind and complete the transition to clean sources of energy. Plants like this one, which will cost ratepayers millions while adversely impacting the local environment and contributing to climate change, have no place in the new economy. We strongly urge you to deny these permits.

Sincerely,

Sue Niemi
President, League of Women Voters
of Ashland and Bayfield Counties