Michael Pollen

I am a resident of Fairbanks, Alaska and currently serve as the Chair of the Fairbanks North Star Borough Air Pollution Control Commission. I am providing these comments as an individual, not in any official capacity.

Thank you for the opportunity to review the proposed regulations and provide these comments. Generally, the proposed regulations appear to be in a proper format for this purpose. They appear to provide the applicant with appropriate guidance with the requirements in a logical sequence that should help facilitate complete and accurate applications.

With regard to 18 AAC XX.300. Location requirements for a microreactor facility, I found the required separation distances from the facility property boundary (50 feet) and from a public right of way (100 feet) to be less than what probably should be considered for a facility that potentially has a heightened security requirement. I attended a public meeting in Fairbanks last October that was facilitated by the (UAF) Alaska Center for Energy and Power where five manufacturers of microreactors presented their concepts for this technology that were possible contending proposals for the installation at Eielson AFB. Some of the designs are buried while others are above ground. Given recent national news of attacks on energy facilities, notably transformer stations, it seems that it may be prudent to require any such installation with a more substantial security barrier including greater separation distances from points of public access. In the case of Eielson AFB, the proposed installation is inside the cantonment area and is intrinsically secure. Other possible sites being considered (e.g. Copper Center/Valdez) or that were discussed in the presentation including remote villages and other locations could be more exposed to the public. What may be appropriate here is a requirement for a security plan in the applicant's submittal.

Other than this recommendation, I would like to add that the use of this technology has a significant potential benefit with regard to air emissions, which was my initial interest in becoming more familiar with it. The proposed project at Eielson AFB will replace part of the existing coal-fired central heating and power plant (CHPP) generation requirements, reducing both particulate and chemical emissions including SO2 which is a precursor to the formation of PM2.5 particulates. Although Eielson is located just outside of the FNSB PM2.5 non-attainment area, demonstration of this technology as a CHPP system with virtually zero emissions is a welcome development.

I appreciate ADEC's proactive preparation of appropriate regulations for microreactors to help facilitate this exciting technological development. Well thought out regulations will be fundamental to allowing this technology to develop throughout Alaska, bringing both environmental and economic benefits to the citizens of our State. Thank you.