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Fairbanks Air Quality Coalition

(An FEDC Task Force)

June 26th, 2019

**Input & Comment: State of Alaska Department of Environmental Conservation
Serious State Implementation Plan (SIP)**

The Fairbanks Air Quality Coalition has actively participated in efforts to improve air quality in our community because we recognize the vital importance to businesses and residents. We encourage participation to ensure the air quality measures that are adopted by the state and federal agencies are economically feasible and reflect the needs of the whole community. Otherwise, the potential sanctions will negatively affect the economic future and quality of life in our community.

The Alaska Department of Environmental Conservation (DEC) has asked for comments on the draft Serious State Implementation Plan (Serious SIP). Please consider using the talking points below to frame your comments to the DEC and sharing with your colleagues, friends, and neighbors. To be most effective, these comments should describe specific impacts on your business or home. Personal examples work best.

Talking Points

The Fairbanks Air Quality Coalition supports the Alaska Department of Environmental Conservation's efforts to improve air quality through the draft Serious State Implementation Plan (Serious SIP). While we have some concerns about specific details of the draft plan, we believe it attempts to strike a workable balance between the need of all residents to breathe healthy air and the need for cost-effective heat and power. We are making progress, and it is worth noting that the community has reduced airborne particulates by approximately 50% over the past 10 years. Over the last five years, 22% reduction in North Pole and 4% decline in Fairbanks when taking warmer winters into consideration.

The Coalition supports measures that can be shown to directly reduce PM 2.5 particulates in the air while mitigating the negative impacts on area businesses, institutions, point sources, and residents.

- We support DEC's recognition of the economic value of point sources to the Fairbanks community, and the economic infeasibility requiring Best Available Control Technologies

(BACT). However, this finding should be extended to incorporate all point sources in the non-attainment area.

- The businesses and residents of the Fairbanks North Star Borough (FNSB) rely on a small number of utilities for heat and power. We request that any requirements for new control devices take into account the unique constraints of each producer and the vital services they provide to the community. We do not want to see infeasible restrictions forcing these utilities to close, ultimately leading to higher energy prices and increased production of harmful airborne particulates as wood burning would likely increase.
- We agree with DEC's finding that ultra-low sulfur diesel (ULSD) is economically infeasible. However, we remain concerned about existing suppliers' ability to meet the proposed conversion timeline from #2 diesel fuel to #1, and potential cost increases. We encourage DEC to robustly analyze the impacts of such a fuel switch in a small market like Fairbanks.
- We support the grandfathering of existing wood stoves. Recognizing that a change of status (i.e. House sale, participation in recognized solid fuel programs, etc.) will require device registration – a measure largely for the purpose of improving future air quality planning.
- We recognize the value to the community of solid fuels (wood, pellet and coal) and support consistent standards for responsible solid fuel use. A major shortcoming of the EPA's evaluation process is that it does not consistently apply emissions standards to solid fuel-burning devices. Focus should be on emission rates per unit of energy rather than banning of specific devices.
- Solid fuel suppliers remain concerned about requirement for dry wood, when no kiln dried wood
 - They support immediate/increased access to lower moisture timber, e.g.. spruce beetle kill and burned forest areas
- Coffee Roasters in area remain concerned as there are no parameters yet to define “economically unfeasible”.
- Clarification of the waiver process is needed. Without a waiver, no Solid Fuel Device can burn during curtailment.
- We still think that some type of enforcement mechanism is needed, though we recognize that is not available under the current program administered by the State.
- We support community and government entities in their efforts to promote responsible energy consumption to new residents and repeat emission offenders. Though not specifically called out in the Serious SIP, ongoing communication is a key component of any real solution.

General Comments

The Fairbanks community (both businesses and residents) has been working collaboratively on additional solutions outside of those proposed in the Serious SIP with the anticipation that these will positively impact air quality. These include:

- Study and use of retrofit control technologies such as Electrostatic Precipitators (ESPs) to reduce particulate discharge at the source.
- A wood kiln to increase availability of dry wood, which will significantly reduce emissions from residential and commercial wood burning.
- A good neighbor campaign to support the Burn Wise (“Split, Stack, Store”) program.

We appreciate the effort DEC has put into the Serious SIP and look forward to working with them in the future to promote responsible use of solid fuel devices. Together, we look forward to improving air quality for all residents and bringing the FNSB into attainment of EPA standards.