

To: Dept. of Environmental Conservation  
From: Gary Newman, 1083 Esro Road, Fairbanks, AK 99712  
Date: June 26, 2019  
Re: Serious Implementation for Fairbanks/North Pole Air Quality PM 2.5

I apologize that the Fairbanks North Star Borough residents haven't been able to accomplish what really is our problem. I appreciate the sincere efforts DEC is making to meet the concerns of the Clean Air Act as administered by the Environmental Protection Agency. It is within our control and obligation to resolve the health risks with the additional concern over potential loss of federal funding for our highways and more.

Millions of dollars have been spent to date by federal, state, local agencies and local utility companies. While we have made some progress in reducing our PM 2.5, we still have a ways to go.

With the most recent vote to deny the FNSB the ability to regulate any aspects of this problem, it falls to DEC. Without **citation authority**, the only way to insure compliance with any programmatic requirements is through legal means. By example, it took 2 years to resolve an egregious outdoor hydronic boiler pollution problem next to Wood River School, which affected hundreds of children and more. This is not only inefficient but extremely costly. As a result, the ability to meet the PM 2.5 reductions is compromised. DEC needs to seek citation authority, even if just limited to administering this program.

The focus on wood stove replacement has been to only allow EPA certified pellet stoves and wood stoves with catalytic converters. I have concerns that the catalysts are easily contaminated with items such as colored paper, require change-out in about 3 years with no way to require proper use and maintenance. For those who are using NOASH or can't afford to use alternate to wood stove for heating their homes, it is reasonable to expect that future maintenance of those catalytic stoves is at risk. In an effort to reduce that risk, it makes sense to encourage non-catalytic stoves that are EPA certified be explicitly allowed, if not encouraged. I understand there is some question about the certification quality and testing of **non-catalytic stoves** that currently meet EPA PM 2.5 standards, so I would urge that resolve that issue with the relevant agencies and manufacturers expeditiously.

I would recommend that **DEC pursue funding the lab studies for the electrostatic precipitators** that the FNSB recently issued a request for proposal, leaving the funding that the FNSB had allocated for actual installations in the field. These ESP devices appear to work quite well in Europe and the recent field installations in North Pole lead to the same functional conclusion. As with cleaning stove chimneys that are annually recommended, these devices could also be cleaned, a simple process. While installations prior to EPA certification may not get us programmatic credit, it will go a long way toward actually reducing the PM 2.5, which is the real goal of our efforts.

I recall the strident objections to the vehicle emissions program a couple decades ago, but when implemented, the sky didn't fall in, and we were able to meet our community obligations and eventually were able to discontinue the program. It shouldn't be so hard for wood burners to consider the impacts to others. Unfortunately, there are enough of those who have difficulty by personal philosophy or economics who are unable to accept their responsibility of their impact to the community. If individuals can't do it, it then logically falls to government to protect the general health and welfare for the benefit of the greater community.

Steve & Co