

From: [Joseph Byrnes](#)
To: [Dec Air Comment](#)
Subject: Public Comment on DEC Serious SIP
Date: Thursday, July 25, 2019 10:02:51 AM
Attachments: [2019 07 25 Rep. LeBon Public Comments on DEC FNSB Serious SIP Proposals \(Final\).pdf](#)

Greetings,

Please find the attached public comments on the proposed Serious SIP from Representative Bart LeBon.

Regards,

Joe Byrnes
Chief of Staff
Office of Representative Bart LeBon
907-451-4347 (Fairbanks)

Alaska State Legislature

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REPRESENTATIVE BART LEBON

July 25, 2018

Cindy Heil
Division of Air Quality
Department of Environmental Conservation
555 Cordova St
Anchorage AK 99501

Submitted Electronically to dec.air.comment@alaska.gov

RE: Comments on Proposed FNSB Serious SIP Regulations

Dear Ms. Heil:

I am submitting the following comments on the Department of Environmental Conservation's proposed regulations relating to fine particulate matter in the serious nonattainment area within the Fairbanks North Star Borough (FNSB).¹

First, let me say that I appreciate the situation that the Department is in implementing the EPA guidelines on air quality and I also appreciate the efforts by the Department and Commissioner Brune for engaging with local stakeholders and the community on this sensitive issue. Commitment to continued quality dialogue will be key to any real solution that balances energy costs with the need for all residents to breath healthy air.

House District 1 covers much of the City of Fairbanks and is in the heart of the PM2.5 Nonattainment Area within the FNSB. While woodburning as a primary source of heat is not very prevalent in my district, several aspects of the proposed Serious State Implementation Plan (Serious SIP) will increase energy costs in a region of the state that already has some of the highest energy costs in urban Alaska.

¹ Regulation Public Notice Link: <https://dec.alaska.gov/Applications/Air/airtoolsweb/FormalComments#>

The requirement in the proposed 18 AAC 50.078 to mandating the sale and purchase of Diesel #1 is particularly concerning. In my district, many residents are neither connected to steam heat or natural gas. As a result, several rely on diesel fuel for their heating needs. The higher costs associated with Diesel #1 would be on top of the already high energy costs that Interior residents incur. I am also concerned with the availability of Diesel #1 within the Interior. The Petro Star Inc. refinery in North Pole may have difficulty in providing that much product, constraining supply and increasing prices. Further economic analysis of the impacts in a small market like Fairbanks should be done before mandating this sort of change.

I appreciate that the Department has determined that mandating Best Available Control Measures/Technologies (BACM/BACT) on the point sources such as the Aurora Energy power plant is economically unfeasible and thus not included in the proposed SIP. I want to echo those economic concerns. Aurora Energy supplies highly efficient and low-cost steam heat to my constituents who live in the downtown area. Mandating BACM would only exacerbate high energy costs that incent residents to turn alternative heating fuels like wood.

Air quality within Fairbanks has improved significantly in the past several years through increased awareness and the changeout of older heating devices. The Interior Gas Utility (IGU) is on track to begin transitioning interruptible customers to non-interruptible status and adding additional customers as early as this winter with the completion of the large LNG storage facility in South Fairbanks. Private entities are pursuing the viability of constructing a centralized wood kiln available to the public to ensure only dry wood is being burned. Through the availability of reliable natural gas and increased use of electrostatic precipitators, I am confident that further air quality improvements will be made. Government-mandated cost-prohibitive proposals that raise energy costs will only reduce my constituents' ability to finance more durable solutions such as converting to natural gas heat.

I urge caution in the Department's approaches as the state looks to move the FNSB into attainment with the PM2.5 standard.

Regards,



Bart LeBon

Representative, House District 1