



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3123

NOV 21 2019

AIR & RADIATION
DIVISION

Ms. Barbara Trost
Division of Air Quality
Alaska Department of Environmental Conservation
555 Cordova Street
Anchorage, Alaska 99501



Dear Ms. Trost:

The U.S. Environmental Protection Agency, Region 10 evaluated the Alaska Department of Environmental Conservation's 2019 Annual Monitoring Network Plan (ANP) dated June 28, 2019. This approval letter documents Region 10's findings from the review of this ANP. Based on our review of the ANP, we did not identify any monitoring deficiencies for Alaska's ambient air monitoring network. The ANP's description of modifications for the Alaskan State network was helpful in our review and is appreciated. Please notify us when ADEC has completed updating AQS to reflect the approved network modifications:

1. Site shutdown of the State Office Building station (02-090-0010) and PM_{2.5} sampling equipment relocation to A-Street (02-090-0040). The A-Street station was approved as a SLAMS station on June 26, 2019;
2. Second Chemical Speciation Network (CSN)Trends Site establishment at Hurst Rd (02-090-0035);
3. Shutdown of Palmer PM₁₀ and PM_{2.5} station (02-170-0012).

With the discontinuation of the Palmer station retaining the SLAMS Butte station (02-170-0008) as the maximum concentration monitor becomes even more important to the design of the Matanuska-Susitna portion of the Anchorage MSA monitoring network. Region 10 is aware that siting issues exist that may require that this site be relocated in the future. Please keep us informed as ADEC investigates siting remedies for this station, or when assessing alternate locations that are equally representative of the air quality at the current Butte station.

During our review of your ANP my staff examined the lead emissions data available in the 2017 National Emission Inventory (NEI) database. This review found four facilities above the 0.5 tons/year emission threshold that require ambient air monitoring (See 40 CFR Part 58, Appendix D §4.5(a)).

Company Name	Site Name	Description	Location	LB/YR	Ton/YR
Northern Star (Pogo) LLC	Pogo Mine	Mining	38 miles NE of Delta Junction	2680	1.34
Teck Alaska, Inc. (Teck)	DMTS Port Facility	Warehousing and Storage	55 Miles NW of Kotzebue	2494	1.25
Hecla Greens Creek Mining Company	Hecla Greens Creek Mine	Mining	18 miles SW of Juneau	2474	1.24
Teck Alaska, Inc. (Teck)	Red Dog Mine	Mining	90 Miles north of Kotzebue	1264	0.63

Region 10 had previously granted a monitoring waiver for the Red Dog Mine facility listed in the table above. As you are aware, the lead monitoring waiver for the Red Dog Mine expires in 2020 unless it is renewed as a part of the 5-Year Network Assessment. Waivers from the monitoring requirement are not currently in effect for any of the other three facilities.

The 2014 NEI database is the version that is currently available to the general public. The 2017 NEI database was used for this review because it has the most current updated emissions data available to my staff. However, since the 2017 version is still being updated by states and quality control of the results are ongoing, errors may exist with the emission data in the 2017 NEI. Please review your emission records for these facilities to assess the accuracy of these lead emissions. If the emissions levels are correct, then ADEC should either:

- begin monitoring the ambient air for lead at these facilities, or
- perform modeling to assess whether monitoring can be waived as allowed by 40 CFR Part 58, Appendix D §4.5(a)(ii)

If ADEC finds that the 2017 NEI lead emission data are in error, please contact us to let us know the cause of the error and update the 2017 NEI database to reflect the actual emissions for these facilities.

Region 10 approves the State of Alaska's 2019 ANP. Region 10 appreciates the timeliness and detail provided in the ANP. If you have any questions about our approval of the ANP, please contact me or Doug Jager at (206) 553-2961.

Sincerely,



Debra Suzuki, Manager
Air Planning, State/Tribal Coordination Branch