

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

1200 Sixth Avenue, Suite 900 Seattle, WA 98101-3140

OCT 28 2015

OFFICE OF AIR, WASTE, AND TOXICS

Ms. Barbara Trost
Air and Water Quality Division
Alaska Department of Environmental Conservation
555 Cordova Street
Anchorage, Alaska 99501-2617

Dear Ms. Trost:

The US Environmental Protection Agency has evaluated the Alaska Department of Environmental Conservation's 2015 Ambient Air Monitoring Network Plan. In the Ambient Air Monitoring Network Plan, ADEC proposed the following changes to the Alaska air monitoring network. The EPA evaluated these proposed changes to the network in accordance with 40 C.F.R. § 58.14(c), and with consideration of the appropriate monitor and probe siting requirements in 40 C.F.R. Part 58, Appendices D and E. Following are the EPA's responses to specific proposed network changes:

• ADEC proposes to re-designate the North Pole Fire Station monitor from a Special Purpose Monitor to a neighborhood-scale State or local monitoring station. This site satisfies the requirement for a neighborhood-scale SLAMS monitor located at maximum concentration area within the Fairbanks non-attainment area, which is specified in Part 58, Appendix D, 4.7.1(b)(1). The EPA approves this change.

The EPA also notes that the requirement for lead (Pb) monitoring at sources with annual Pb emissions exceeding 0.5 tons/year, as specified in Appendix D, Section 4.5, is currently not being met for the Red Dog Mine, which has an annual Pb emission rate greater than 0.5 tons/year. The EPA understands that ADEC is modeling Pb emission from the Red Dog Mine to determine if the modeled emissions do not exceed 50% of the Pb National Ambient Air Quality Standard and therefore would potentially qualify the mine for a monitoring waiver.

Except for the lack of Pb monitoring at the Red Dog mine, the EPA is approving the 2015 Ambient Air Monitoring Network Plan because it contains the necessary information about the network's existing and proposed sites, as identified in 40 C.F.R. § 58.10(b).

We have been discussing with you the need to report to the EPA short-term Special Purpose Monitor data, for SPMs configured as a Federal Equivalent Method, collected in the Fairbanks non-attainment area. In the follow-up to these discussions, we believe it is important for all data from these monitors to be submitted to the EPA. Data from any such monitors that operate for a month or longer needs to be entered into the Air Quality System, while data from SPM that operate for less than a month can be provided to the EPA's Region 10 in a spreadsheet format. Additionally, for any new SPM/FEM monitors, there should not be any "start-up time" during which collected data are not reported to the EPA. Please give us a call if you would like to discuss this further.

Your agency is separately required to verify annually that maintenance areas in your State that have qualified for a Limited Maintenance Plan remain eligible for LMP status by verifying that the design values for these maintenance areas continue to remain below the LMP threshold for the pollutant of concern. We have not yet received this verification from you. In the future, this information could be submitted along with the annual Ambient Air Monitoring Network Plan.

If you have any questions about our approval of the 2015 Ambient Air Monitoring Network Plan, please contact Keith Rose at (206) 553-1949.

Sincerely,

Debra Suzuki, Manager

Air Planning Unit