

From: [Michelle Ohnesorge](#)
To: [Dec Air Comment](#)
Subject: FBKS Serious SIP Comments
Date: Friday, July 26, 2019 3:38:17 PM
Attachments: [FEDC Air Quality Position FINAL draft mmo.docx](#)

Attached are comments on behalf of the Air Quality Coalition that meets under the Interior Issues Council at Fairbanks Economic Development Corporation.

Thank you!

Michelle Ohnesorge
Project Manager
Fairbanks Economic Development Corporation
(907) 452-2185

July 24, 2019

Division of Air Quality, ADEC
Attn: Cindy Heil
555 Cordova St
Anchorage, AK 99501

Submitted electronically

Dear Ms. Heil,

The Fairbanks Economic Development Corporation (FEDC) supports the Alaska Department of Environmental Conservation's efforts to improve air quality through the draft Serious State Implementation Plan (Serious SIP).

Continuing the effort of the local Air Quality Stakeholders group, FEDC is attempting to continue the conversation with an Air Quality Coalition made up of some of the original stakeholders. This coalition is focused on community-based solutions, education, and outreach in order to bring the area into attainment. 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, North Pole has seen a 22% reduction and Fairbanks has seen a 4% decline when taking the warmer winters into account (PowerPoint presentation by FNSB Air Quality Manager, <http://fnsb.us/transportation/AQDocs/2018-07-16%20FNSB%20AQ%20Stakeholders.pdf>).

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

- There is a critical need to provide effective enforcement authority over the requirements in the Serious SIP. Ultimately, we believe that local control of a comprehensive air quality program is preferable. A full response will include continued education, enforcement, stove change-outs, etc., but the

October 2018 ballot initiative (Proposition 4) restricts this local authority for a minimum of two years.

- 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 production of harmful airborne particulates as wood burning would likely increase.
 - The cost to remove 1 ug/m³ of sulfur-based fine particulates from stationary sources is well over \$10 million in annualized cost for the major stationary sources in the nonattainment area. This assessment used information provided in the draft SIP for BACT analyses, sulfur analysis, and adjusting for actual emissions. Considering the small percentage contribution of these emissions to the overall air quality problem, this cost and its potential financial effects on the community are unreasonably high. Based on the 2016 PM_{2.5} implementation rule, the state may make a demonstration that any measure is economically infeasible. For the purposes of evaluating economic feasibility, cost effectiveness of the measure can be considered [40 CFR 51.1010(3)(ii)]. As such, we support an economic infeasibility determination for the application of BACT on all major stationary sources within the nonattainment area.
 - We support revising the coal standards to 0.25% sulfur content. We think the proposed 0.20% sulfur content would not create a meaningful improvement in air quality, but would set an unreasonable standard for mining local coal in Alaska, which would significantly disrupt the local energy market.
- We agree with DEC's finding that ultra-low sulfur diesel (ULSD) is economically infeasible. However, we remain concerned about existing local 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 within the proposed timeline.
- A major shortcoming of the EPA's evaluation process is that it does not consistently apply emissions standards to solid fuel-burning devices. Focus

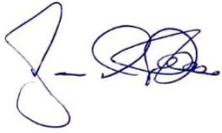
should be on emission rates per unit of energy (e.g. 0.1 lbs/mmbtu) rather than banning of specific devices.

- Retrofit control devices have been shown to reduce or eliminate effluent discharge. The option to demonstrate conformance to an emission standard while using retrofit devices should be recognized as an option for all solid fuel burning devices. They should be allowed as acceptable methods to bring emitters into compliance and a regulatory path should be established to get these devices to consumers
- We recognize the value to the community of solid fuels (wood, pellet, and coal) and support consistent standards for responsible solid fuel use.
 - 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.
 - Clarification is needed of the solid fuel device waiver process and requirements. Without a waiver, no solid fuel device may burn during curtailment. This results in restrictions even on responsible, compliant solid fuel burners.
 - We support a community kiln and other innovative solutions to addressing the necessary supply of green wood.
 - We support increased access to lower moisture timber. This may include access to timber destroyed by spruce beetle and burned areas of forest.
- Coffee roasters should remain exempt from regulations until more data is gathered in order to set definitions which can inform a determination for individual roasters.
- 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 education is a key component of any real solution.

As this process moves forward, we encourage the DEC to begin communicating about the “5% Reduction Plan” that will likely be submitted by the DEC to EPA, December 2020. This plan has not been discussed with the community or businesses.

FEDC appreciates the effort the DEC has put into the Serious SIP and look forward to working with you to improve the air quality for all residents and bringing the FNSB into attainment of EPA standards.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim Dodson". The signature is stylized with a large initial "J" and a circular flourish.

Jim Dodson

President & CEO

Fairbanks Economic Development Corporation