

Department of Environmental Conservation

DIVISION OF AIR QUALITY
Director's Office

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April 2, 2018

Mayor Howard K. Brower, Jr. North Slope Borough P.O. Box 69 Barrow, AK 99723

Subject: 2017 Alaska Annual Air Monitoring Network Plan comments February 23, 2018

Dear Mayor Brower:

The Alaska Department of Environmental Conservation (DEC) thanks the North Slope Borough (NSB) for taking the time to provide comments to DEC's Draft 2017 State of Alaska Annual Air Quality Monitoring Network Plan.

Over many of the past years, DEC Air Quality has received occasional complaints from individuals who have been concerned with air quality impacts in the North Slope from oil and gas development. These sporadic communications have become more frequent as more area is opened for oil development. While ambient air monitoring data collection is one way of checking that industry is not improperly impacting an area, DEC has relied on its Air Quality Division Permit Program to regulate the oil industry.

The Permits Program employs a rigorous and thorough permitting process for oil companies on the North Slope. This includes review of monitoring and meteorological data required for any permit application. The data are included in conservative air quality models, which estimate the amount of pollution produced by industry activity. No facility is allowed to degrade the ambient air quality in order to protect public health.

DEC's Air Quality Compliance Program requires companies to submit regular compliance reports which DEC reviews for completeness and adherence to the permits. The Compliance Program follows up frequently with all permitted sources including conducting onsite visits every other year. Each permit contains requirements for regular and special maintenance records to be reviewed, continuous emissions monitoring, changes in equipment or fuels and often periodic source tests to ensure compliance with emissions limitations.

These Air Quality Division programs work together as a unit. Adding an ambient monitoring station in Nuiquet or elsewhere in the North Slope Borough creates redundancy that is difficult for the State to afford during this time of fiscal reductions.

DEC would like to meet with the NSB to further address the concerns your letter outlined, especially from the community of Nuiqsut. Please contact our Air Monitoring and Quality Assurance Program Manager, Barbara Trost. Barbara can be reached at Barbara Trost. Barbara Trost will be in Barrow on April 19 if you would like to meet in person.

Sincerely,

Denise Koch, Director Division of Air Quality

cc: Larry Hartig, DEC/Commissioner

Alice Edwards, DEC/Deputy Commissioner
Barbara Trost, DEC/AMQA Program Manager
James Plosay, DEC/ Air Permits Program Manager
James Baumgartner, DEC/ Air Compliance Program Manager