

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION
OFFICE OF THE COMMISSIONER

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Elin Miller, Regional Administrator
U.S. Environmental Protection Agency Region 10
1200 Sixth Avenue, Suite 900
Mail Code: RA-140
Seattle, WA 98101-3140

Dear Ms. Miller:

The Alaska Department of Environmental Conservation (ADEC) has reviewed your August 18th letter regarding EPA's PM_{2.5} designations for Alaska and the nonattainment boundaries for the communities of Fairbanks and Juneau. We have carefully considered the available data and analyses. ADEC believes the available scientific evidence does not support EPA's boundary recommendations which substantially expand upon those recommended by us. ADEC believes public health will be protected and the applicable legal requirements met by taking the actions described in this letter, which include a proposed nonattainment boundary for the Fairbanks area that is larger than originally proposed by ADEC, but smaller than proposed by EPA. For Juneau, we are requesting EPA revisit certain assumptions and include data from 2008 before making a final decision on whether a nonattainment designation is warranted, and if so, the appropriate boundaries of the nonattainment area.

Protecting public health is a goal we share with EPA. As you are already aware, we are proactively and expeditiously working with the local governments to address identified PM_{2.5} concerns in Fairbanks and Juneau. To this end, ADEC does not believe EPA's proposed boundaries will ultimately assist in protecting public health. To ask the public to incur additional costs or forego what they may see as beneficial opportunities in their communities in order to reduce PM_{2.5} emissions, we should have a much better basis for predicting air quality and health benefits than exists for EPA's proposed extended boundaries. Again, we believe public health will be protected with the actions we propose and appreciate your consideration of them along with the enclosed data and information.

Fairbanks

ADEC's original boundary recommendation for Fairbanks, Alaska followed the factor analysis approach set out in EPA guidance and was based on available data collected within the local community. The supplemental information provided with

this letter updates and adds to the original analyses provide by ADEC in support of its boundary proposal. The entirety of data supports a modification of both the original ADEC recommended boundary and the EPA proposed boundary. We have included a revised nonattainment boundary for consideration. We believe this boundary is appropriate, defensible, and is based on the best local data available at this time.

If you determine that the available data does not support this modified boundary, the ADEC encourages you to consider options that allow for additional data to be collected and included in the analyses used to set the final boundary. The ADEC and the Fairbanks North Star Borough have initiated an extensive monitoring program for this coming winter that will provide insight into source specific contributions as well as the size and extent of the area exceeding the 24-hour $PM_{2.5}$ standard. This \$2.64 million dollar effort is underway and will generate significant new data over the next winter that would inform a final boundary. In addition, EPA is engaged in a $PM_{2.5}$ modeling research program in the Fairbanks area that will also inform the decision process.

ADEC believes there are two options available to allow for the time needed to make an informed boundary decision. First, EPA could use the extension provided under the CAA Section 107(d)(1)(B)(i) where the designation period can be extended for up to one year if the Administrator needs additional information. This would allow data from this winter's effort to be submitted and considered in the boundary decision. Second, EPA could consider and implement the proposal by ADEC to set a smaller boundary now and then expand the boundary in the future, if warranted, based on the data collected this winter. This would allow for timely initiation of the air quality planning process but still recognize the uncertainty in the scope of the problem and sources involved.

Juneau

The higher $PM_{2.5}$ design value for Juneau was not identified until after ADEC submitted its initial nonattainment recommendations. Since that time, ADEC has focused on design value calculation procedures and determined that the nonattainment designation for Juneau may not be warranted. ADEC agrees that Juneau can approach the 24-hour $PM_{2.5}$ ambient air quality standard in the Mendenhall Valley under certain meteorological conditions, however, it is not clear that the design value actually exceeds the ambient air quality standard. Therefore, ADEC requests that EPA carefully review the design value for Juneau to insure it has been calculated appropriately. ADEC believes the design value may be biased high due to the inclusion of additional sample days.

Recognizing Juneau's Mendenhall Valley can approach the 24-hour $PM_{2.5}$ standard ADEC is proactively working with the City & Borough of Juneau to protect public health by controlling $PM_{2.5}$. The City & Borough of Juneau amended its existing wood stove control program in September 2008 to address the new $PM_{2.5}$ standard. The revised ordinance is in effect and allows for burn bans to be called when

concentrations approach the PM_{2.5} ambient air quality standard. ADEC will include the revised ordinance in the Alaska SIP as part of the Limited Maintenance Plan for the Juneau PM₁₀ area making the requirements state enforceable as well. As a result, ADEC requests EPA revisit Juneau's nonattainment designation based on the 2006-2008 monitoring data. The 2008 data should be available by February 2009. With the revised ordinance in place, it is likely that the design value for this three year period will be below the 24-hour PM_{2.5} ambient air quality standard.

Because the higher design value for Juneau was not identified until this past spring, there was little to no time for proper development of a boundary proposal. As a result, ADEC made a boundary recommendation for Juneau that was based on the existing PM₁₀ nonattainment boundary. This PM₁₀ boundary was approved by EPA and has stood for more than twenty years as the community, ADEC, and Region 10 EPA successfully worked to bring this area into compliance. In Juneau, the PM₁₀ nonattainment area was caused primarily by localized, short term episodes of high PM_{2.5} from residential wood smoke. Juneau addressed the problem to meet the PM₁₀ standard through the adoption of a burn ban ordinance. Now, wood smoke has reemerged as an episodic, localized problem. The only real change to the situation has been the more stringent PM_{2.5} standard promulgated by EPA. An expansion of this boundary to the scale envisioned in the EPA proposal is not sensible and fails to account for the fact that this is not a new concern - a concern Juneau is already taking steps to solve. In the enclosure, ADEC provides data and information following the factor approach set out in EPA guidance to justify the existing PM₁₀ boundary as the appropriate boundary for a PM_{2.5} nonattainment area, should an area need to be designated.

ADEC encourages EPA to carefully review the Juneau monitoring data and additional information provided. ADEC recognizes that Juneau has the potential to approach the 24-hour PM_{2.5} ambient air quality standard in the Mendenhall Valley under certain meteorological conditions. However, ADEC is not convinced the area meets the criteria for a nonattainment designation. Further, ADEC and the community of Juneau are already actively working on ways to control fine particulate air pollution. The wood smoke problem is already addressed through the PM₁₀ air quality plan and that plan now includes a more stringent wood smoke control program. Public health is being protected. A new round of air quality planning would be redundant and a poor use of limited resources.

Summary

The information provided by ADEC, with extensive support from local communities and military bases, demonstrates that smaller nonattainment area boundaries are appropriate in both Fairbanks and Juneau. Moreover, the inclusion of Juneau as a PM_{2.5} nonattainment area should be further reviewed to insure that such a designation is truly warranted. We look forward to working with EPA to ensure compliance with controls and real-world protection of public health. We would be happy to discuss any of the data provided or the options proposed with you or staff. Our primary goal is to have nonattainment area boundaries that are based on sound

data and that allow for protection of public health. Our primary program contacts for this issue are Alice Edwards, Acting Air Quality Director, and Clint Farr, Air Non-Point Section Manager.

Sincerely,



Larry Hartig
Commissioner

Enclosures

cc: Governor Sarah Palin
Mayor Whitaker, Fairbanks North Star Borough
Rod Swope, City Manager, City and Borough of Juneau
Robert Meyers, Assistance Administrator, Office of Air and Radiation, EPA
Steve Page, Director, Office of Air Quality Planning and Standards, EPA
Bill Harnett, Director, OAQPS Division of Air Quality Policy, EPA