



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

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

AIR & RADIATION
DIVISION

JUN - 4 2019

Ms. Barbara Trost
Air Quality Division
Air Monitoring & Quality Assurance Program
Alaska Department of Environmental Conservation
555 Cordova Street
Anchorage, Alaska 99501-2617

Dear Ms. Trost:

This letter is in response to your May 14, 2019, correspondence requesting that the siting requirements specified in 40 CFR Part 58, Appendix E be waived for the existing Butte ambient air monitoring station (AQS ID: 02-170-0008). Such waivers may be approved pursuant to Appendix E upon a demonstration that either (1) the site can be demonstrated to be as representative of the monitoring area as it would be if the siting criteria were being met, or (2) the monitor or probe cannot reasonably be located so as to meet the siting criteria because of physical constraints (e.g., inability to locate the required type of site the necessary distance from roadways or obstructions). My staff have completed the review of the information provided in your request. In considering your waiver request, Region 10 examined the information you provided in the correspondence to us and the available historic monitoring data produced by ADEC for this monitoring station.

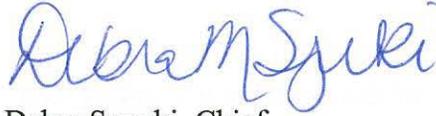
Region 10 agrees with your assessment that the spacing from roadways requirement, as specified in 40 CFR Part 58, Appendix E §6, is met for the Butte air monitoring station. The vehicle traffic at this location is minimal and sufficiently offset from the ambient air monitoring station such that the requirements of Table E-1 of Appendix E to Part 58 are satisfied. Region 10 acknowledges the uniqueness of this monitoring station's position on the Harrison Court cul-de-sac. EPA is affirming through this correspondence that the Butte air monitoring station (AQS ID: 02-170-0008) meets the regulatory requirements of 40 CFR Part 58, Appendix E §6 and as such ADEC does not require a waiver from EPA for this requirement.

The measurements provided in your request documenting the distances between the probe inlets for the Butte monitoring station to the driplines of the nearby trees demonstrate that the requirement for spacing monitoring inlets away from trees found in 40 CFR Part 58, Appendix E §5 is not met and a monitoring waiver is needed for this ambient air monitoring station. Region 10 agrees with your assessment that the probe inlets are not so obstructed as to change the representativeness of the PM₁₀ and PM_{2.5} measurements at this ambient air monitoring station. As such, Region 10 approves a waiver from the 40 CFR Part 58, Appendix E §5 siting requirements for this site. This waiver is in effect for five years from the date of this letter.

Due to the proximity of the trees to the probe inlets and siting conditions that will continue to degrade due to tree growth, Region 10 encourages ADEC to remedy the siting conditions if possible through limb trimming or tree removal if possible. If the trees cannot be trimmed or removed, ADEC should begin investigating an alternate ambient air monitoring station that is

representative of this maximum concentration site. DEC can request a renewal of this waiver at the end of the 5-year period based on the siting conditions at that time, but Region 10 encourages ADEC to either remedy the siting conditions at this location or find a replacement ambient air monitoring site within the timeframe of this waiver. If you have any questions regarding this correspondence, please contact me at (206) 553-0985 or Doug Jager at (206) 553-2961.

Sincerely,



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