



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
AIR, WASTE AND TOXICS

FEB 02 2015



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

Dear Ms. Trost:

The Environmental Protection Agency has evaluated the Alaska Department of Environmental Conservation's amendment to the 2014 Alaska Annual Monitoring Network Plan, dated January 6, 2015. The amendment includes the following proposed changes to the Alaska monitoring network:

1. Closure of the Turnagain CO monitoring site. 40 CFR 58.14(c)(1) allows the EPA to approve the shutdown of a SLAMS monitor that has "...a probability of less than 10 percent of exceeding 80 percent of the applicable NAAQS during the next three years based on the levels, trends, and variability observed in the past, and which is not specifically required by an attainment plan or maintenance plan." The EPA conducted a probability analysis to determine if the above conditions have been met for this monitor, and found that the conditions are met at a 95% confidence level. Therefore, the EPA approves the discontinuation of this monitor.
2. Relocation of the Anchorage PM₁₀ maximum exposure site. Anchorage received notice in October 2014, that the owner of the property at 3335 East Tudor Road, which Anchorage uses for their maximum concentration PM₁₀ site, intended to terminate their access to the site and demolish the structure on which the monitor was located. As a result, Anchorage intends to relocate this site to another near-road site potentially along Tudor Road or along another arterial roadway with similar PM₁₀ emission characteristics. According to 40 CFR 58.14(c)(6), the EPA is allowed to approve the relocation of a monitor to a nearby location if logistical problems beyond the State's control make it impossible to continue operation at its current site. This situation applies to the PM₁₀ monitor at the Tudor Road site, and therefore the PA approves the relocation of this monitor to a similar site in Anchorage.

We would also like to address a few items related to air quality monitoring in the Fairbanks/North Star Borough nonattainment area. Because the monitor that has been in operation at the North Pole Fire Station since 2012 meets all regulatory criteria, data from this monitor will be used to calculate a 2012-2014 PM_{2.5} 24-hour design value for this nonattainment area.

In its 2014 Annual Monitoring Network Plan submitted last summer, ADEC listed the North Pole Fire Station monitor as a micro-scale site, whereas in the 2013 Annual Monitoring Network plan ADEC listed it as a neighborhood-scale site. While data from this monitor will remain NAAQS comparable whether the site is determined to be neighborhood or micro-scale, it is important to resolve the question of the scale of the site to ensure that the State is in full compliance with the Appendix D to Part 58 requirement to establish a neighborhood-scale site in an area of expected maximum concentration. Absent evidence to support the change in monitor designation, the North Pole Fire Station site remains a neighborhood scale site, consistent with our approval of the Alaska 2013 Annual Monitoring Network Plan. As we have discussed, if ADEC would like the EPA to reconsider the scale of this site, we recommend that ADEC conduct a saturation study (or a similar study) to demonstrate the scale of this site. Once the results of this study are available, please submit them to us with your recommendation for the appropriate monitoring scale of this site.

If you have any questions about any topic covered in this letter, please contact Keith Rose at (206) 553-1949.

Sincerely,



Robert Elleman, Acting Manager
Air Planning Unit