

From: [Jinnel Choiniere](#)
To: [Dec Air Comment](#)
Subject: Comments on Air Quality Serious SIP
Date: Thursday, July 25, 2019 11:12:26 AM
Attachments: [image001.png](#)
[image003.png](#)
[image005.png](#)
[Fairbanks Chamber Air Quality Serious SIP Comments.pdf](#)

Hello,

Please find attached formal comments on the Air Quality Serious SIP from the Greater Fairbanks Chamber of Commerce. Please let me know if you have any questions or have any trouble with the attached PDF letter.

Thank you,
Jinnel Choiniere

JINNEL CHOINIÈRE
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July 25, 2019

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

Submitted electronically

Dear Ms. Heil,

The Greater Fairbanks Chamber of Commerce supports the Alaska Department of Environmental Conservation's efforts to improve air quality through the draft Serious State Implementation Plan (Serious SIP). 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.

The Fairbanks Chamber 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 changeouts, 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 of 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. Also, the industry standard product specification for diesel #1 should be used so as to minimize market inefficiencies.
- 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.
- 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.



- Solid fuel suppliers remain concerned about the requirement to sell only dry wood when no wood kiln exists in the region.
 - We support increased access to lower moisture timber. This may include access to timber destroyed by spruce beetle and burned areas of forest.
 - In consideration of the financial impact on the community, we believe that allowance should be made for sale of green fire wood during the off-season to allow sufficient time for drying prior to the peak wood burning period.
- Coffee roasters have not been shown to be significant contributors to the problem in this region. We recommend that you remove the control technology provision as economically infeasible for these businesses.
- 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.

We appreciate the effort DEC has put into the Serious SIP and look forward to working with you in the future. Together, we look forward to improving air quality for all residents and bringing the FNSB into attainment of EPA standards.

The Greater Fairbanks Chamber of Commerce is an independent membership organization representing over 700 business members throughout Interior Alaska. We work to advocate for the best business environment, promote economic strength and growth for Interior Alaska, and to develop the resources and networks enterprising people use to share knowledge.

Respectfully,

A handwritten signature in black ink that reads "Marisa Sharrah".

Marisa Sharrah
President/CEO

A handwritten signature in black ink that reads "Rebecca Dean".

Rebecca Dean
Board Chair