

From: [Michelle Deckard](#)
To: [Dec Air Comment](#)
Subject: FEDC Air Quality Coalition Comments
Date: Monday, October 26, 2020 12:43:00 PM
Attachments: [FEDC Coalition Comments .docx](#)

Please find attached the comments of Fairbanks Economic Development Corporation's Air Quality Coalition on the 2020 Serious SIP amendment.

Thank you,

Michelle Deckard
Project Manager
Fairbanks Economic Development Corporation
(907) 452-2185

October 26th, 2020

Division of Air Quality, ADEC
Attn: Rebecca Smith
P.O. Box 111800
Juneau, AK 99811-1800

Submitted electronically

Dear Ms. Smith,

The Fairbanks Economic Development Corporation (FEDC) supports the Alaska Department of Environmental Conservation's efforts to improve air quality through the 2020 amended Serious State Implementation Plan (SIP).

Continuing the efforts of the local Air Quality Stakeholders group, FEDC is continuing the conversation with an Air Quality coalition made up of some of the original stakeholders. This coalition is focused on community-based solutions, education, and outreach in order to bring the area into attainment. While we have some concerns about specific details of the 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.

The AQ Coalition supports measures that can be shown to directly reduce PM 25 particulates in the air while mitigating negative impacts on area businesses, institutions, point sources, and residents.

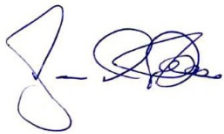
- We appreciate the new data consideration and modeling that reflect the progress our community has made over the last years that is now represented in this amended document. While there is still work to do, having the communities effort reflected will help with cooperation and overall compliance.
- There is a critical need to provide effective enforcement authority over the requirements in the amended 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 change-outs, etc., but the October 2018 ballot initiative (Proposition 4) still restricts the local authority.
 - o With the upcoming effective dates for certain removal for specific devices, a lack of enforcement is going to limit the compliance to this measure. A home sale is going to be the only willing compliance.
- A major shortcoming of the EPA's evaluation process is that it does not consistently apply emission standards to solid fuel-burning devices. Focus should be on emission rates per unit of energy (e.g. 0.1 lbs/mmbtu) rather the banning of specific devices.

- In accordance with 18 AAC 50.077, some of the solid fuel heating devices that are being taken off the list of acceptable appliances are stoves that have an average emission rates certified by the EPA and less than 2 g/h. The criteria of greater stringency being used to remove these units from the acceptability list is any rolling 60-minute period in excess of 4.0 g/h using tapered element oscillating microbalance (TEOM) or 1-hour filter data from the EPA certification report for the device. A tested stove may emit more than 2 g/h within a given hour, per se, but if its average emission over time is less than 2 g/h then it has 'loaded' the atmosphere with the equivalent of 2 g/h. Therefore, to take those types of stoves off the list seems 'self-defeating' for the community. The spot check emission loading rate is not a good measure of a stoves overall performance. Using this criteria is likely to remove good stoves from a list of consumer options for the area. As such the justification for eliminating stoves that have 1-hour spikes over 4.0 and 6.0 g/h is a self-defeating proposition for the community. Especially, if the average emission rate for the test period of a non-qualifying unit is below 2.0 g/h. We suggest that the language within the SIP amendment provide a contingency for those stoves that may emit more than 4.0 or 6.0 g/h in any rolling hour or 1-hour filter pull yet retain an overall performance of less than 2.0 g/h.
- While new testing on retrofit control devices, specifically electrostatic precipitators, may have been inconclusive to show a reduction or eliminate effluent discharge, we hope this option will continue to be explored and tested as it has been proven effective in European countries.
- The impression given by the state with reference to the 2020 Amendment was that the model performance run for all species and precursor gases were to be updated; including a potential update to the sensitivity analysis for SO₂ from major sources. The expectation was that the newer modeling platform and meteorology could provide better clarity to the PM_{2.5} contribution from major source SO₂ emissions. It appears as if only the NO_x precursor demonstration was updated. The modeling efforts, while updated, have not been updated to the newest 'platform' as of yet; potentially within six months. As such, the newest information for modeling has not been included in the amended SIP. Therefore, the specific contributions to the NAA problem from the stationary source sulfur dioxide emissions cannot be modeled to determine whether they are significant (which is what has triggered BACT requirements for point sources).
 - o If the EPA approves the Serious SIP and the amended SIP, and the newest modeling platforms show that major stationary sources are not significant contributors, it would be prudent to state within the modeling section that the state will reserve the right to retroactively amend the SIP to remove BACT requirements from the stationary source.
- We recognize the value to the community of solid fuels (wood, pellet, and coal) and support consistent standards for responsible solid fuel use.
- The Coalition recognizes that the 2020 heating season may present a challenge in compliance when taking into consideration the COVID-19 pandemic. With many people still working from home and students distance learning, our community could be utilizing more heat than ever this winter, which will likely include more solid fuel burning. While

there is no leniency in the plan for this situation, we hope the DEC takes into consideration the uniqueness of this year and the challenges it may bring for our residents.

FEDC appreciates the effort the DEC has put into the amended Serious SIP and look forward to working with you to improve the air quality for all residents and bringing the FNSB into attainment of EPA standards.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim Dodson". The signature is stylized with a large initial "J" and a circular flourish.

Jim Dodson

President & CEO

Fairbanks Economic Development Corporation