



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
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OCT 30 2014

OFFICE OF
AIR, WASTE AND TOXICS

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

Dear Ms. Trost:

EPA has evaluated the Alaska Department of Environmental Conservation's (ADEC's) 2014 Ambient Air Monitoring Network Plan (2014 Plan). In the 2014 Plan, ADEC proposed changes to the Alaska air monitoring network. EPA evaluated these proposed changes to the network in accordance with 40 C.F.R. § 58.10, and with consideration of the applicable requirements in 40 C.F.R. Part 58, Appendices D and E. Following are EPA's responses to specific proposed network changes:

- DEC proposed relocating the Chemical Speciation Network (CSN) monitor currently at the State Office Building site in Fairbanks to the Fairbanks NCore site in October 2014. The NCore site is located less than 0.5 miles from the State Office Building site and was intended to include the CSN monitor. A comparison of the 2011/2012 and 2012/2013 winter speciation data shows good agreement between both sites. The Office of Air Quality and Planning and Standards (OAQPS) has the authority to approve relocation of CSN monitors. Richard Wayland, Director of the Air Quality Assessment Division of OAQPS, sent you a letter dated October 14, 2014, approving the relocation of this monitor to the Fairbanks NCore site.
- DEC proposed to discontinue the Fairbanks State Office Building PM_{2.5} Federal Reference Method (FRM) SLAMS monitor starting with the winter of 2015/16 and use the NCore PM_{2.5} FRM as a surrogate. However, even though the two sites are in close proximity, EPA concludes that none of the criteria for discontinuation of a SLAMS monitor provided in 40 C.F.R. § 58.14(c) have been satisfied. In addition, since the State Office Building monitor has violated the PM_{2.5} 24-hour National Ambient Air Quality Standard (NAAQS) every year for the past 5 years, this monitor does not qualify to be discontinued on a case-by-case basis because this would compromise data collection needed for implementation of the NAAQS. Therefore, EPA disapproves ADEC's request to discontinue this monitor.
- DEC proposed shutting down the Fairbanks Old Post Office (OPO) CO monitor before the next CO sampling season begins on October 1, 2014 and using the CO monitor at the Fairbanks NCore site, about 0.25 miles away, to determine compliance with the CO NAAQS in this maintenance area. CO concentrations at the OPO site have been in attainment with the CO 8-hour NAAQS for the past five years, and the Fairbanks North Star Borough monitoring staff have had increasing difficulty in accessing the site due to access restrictions imposed by building tenants. EPA therefore approves the discontinuation of this monitor pursuant to 40 C.F.R. § 58.14(c)(6), which allows a

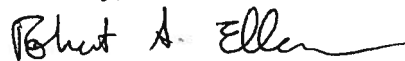
state to move a monitor to nearby location with the same scale of representation if logistical problems that are beyond the state's control make it impossible to continue the monitor's operation at its current site.

EPA also reviewed the information submitted regarding Alaska's existing monitoring network, and found that the monitoring network generally meets the requirements of 40 C.F.R. Part 58, with two exceptions. First, EPA notes that the requirement for lead (Pb) monitoring at sources with annual Pb emissions exceeding 0.5 tons/year, as specified in Appendix D 4.5, is currently not being met at the Red Dog Mine site, which has an annual Pb emission rate greater than 0.5 tons/year.

Second, EPA has become aware of a second PM_{2.5} monitoring site in the town of North Pole, in addition to the North Pole Fire Station PM_{2.5} monitoring site which was identified in Alaska's 2014 Plan. This second site began operation in October 2014. All monitoring sites operating in a state's network, including Special Purpose Monitors, must be identified in the state's annual monitoring plan in accordance with 40 C.F.R. § 58.10(a)(1). EPA requests that ADEC provide additional information regarding the North Pole monitor that clarifies its purpose and role in the state's monitoring network, and explains how this monitor meets the requirements of Appendices A, C, D and E.

If you have any questions about our approval of Alaska's 2014 Plan, please contact Keith Rose at (206) 553-1949.

Sincerely,



Robert Elleman, Acting Manager
Air Planning Unit

cc: Chris Hall, OEA
Keith Rose, OAWT
Claudia Vaupel, OAWT