



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Environmental Conservation

OFFICE OF THE COMMISSIONER

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June 12, 2018

Mr. Chris Hladick
Regional Administrator
Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, WA 98101

Subject: Request to Divide the Fairbanks North Star Borough PM_{2.5} Nonattainment Area

Dear Mr. Hladick:

On November 20, 2015, the State of Alaska sent a request to the Environmental Protection Agency (EPA) Region 10 Regional Administrator pursuant to Section 107(d)(3)(D) of the Clean Air Act for a change in the Fairbanks North Star Borough (FNSB) fine particulate matter (PM_{2.5}) Nonattainment Area boundary. Based upon monitoring and other data that was available at the time, the State believed that there were important differences between the Fairbanks portion of the nonattainment area and the North Pole portion and that dividing the area would allow each nonattainment area to tailor solutions that were best suited to their area. The State therefore requested that the existing nonattainment area be divided into two separate areas. One area would have encompassed the western portion of the existing nonattainment area and would have included the City of Fairbanks. The other area would have encompassed the eastern portion of the existing nonattainment area including the City of North Pole. The State submitted a Technical Support Document that included a ten factor analysis to support the request.

Section 107(d)(3)(D) of the Clean Air Act requires that EPA act upon the November 20, 2015 request within 18 months. We understand that EPA Region 10 has been working to review this request and appreciate the close coordination between our two agencies throughout this process.

After the State submitted the request to divide the FNSB nonattainment area, EPA promulgated the PM_{2.5} Implementation Rule effective October 24, 2016. This rule clarified and added requirements for PM_{2.5} nonattainment areas. In addition, EPA then reclassified the FNSB area from a Moderate to a Serious nonattainment area for the 24-hour PM_{2.5} standard effective June 9, 2017. Given the complexities involved in the split request after the subsequent reclassification and the focus needed on development and implementation of the Serious SIP, the Department of Environmental Conservation (DEC) is requesting that EPA hold the November 20, 2015 split request in abeyance. This should not be construed as a waiver of any of Alaska's rights to make a request to change the nonattainment area boundary in the future under the Clean Air Act or any other laws. DEC may revisit the request to split the FNSB nonattainment area as future conditions dictate.

At this time, DEC requests that EPA continue to engage with us to identify and further clarify monitoring, data, and planning considerations relevant to supporting and implementing such a request, if one were made in the future. For example, EPA has recently indicated that separate nonattainment areas would each be required to have a maximum impact monitoring site. DEC is currently exploring the option for siting a monitor in a maximum impact site in the western portion of the existing nonattainment area that includes the City of Fairbanks. DEC will work with EPA during this process and expects that EPA will bring forward any concerns or thoughts about the monitoring location or monitoring equipment early in the process. DEC also expects that EPA will inform the State of any other monitoring, modeling, or planning data needs.

DEC is committed to working with the FNSB and EPA in our mutual goal to move the area toward attainment. I believe it is important that we work together in finding paths to attainment, which may include a future split of the area.

Sincerely,



Larry Hartig
Commissioner

cc: Alice Edwards, DEC Deputy Commissioner
Denise Koch, DEC, Air Quality Division Director
Cindy Heil, DEC, Air Non-Point Mobile Sources Manager
Barbara Trost, DEC, Air Monitoring & Quality Assurance Manager
Mayor Karl Kassel, Fairbanks North Star Borough
Mayor Bryce Ward, City of North Pole
Mayor Jim Matherly, City of Fairbanks
Tim Hamlin, EPA Region 10
Dan Brown, EPA Region 10