

## <u>Fine Particulate Matter</u> (PM2.5) Update

#### <u>Presentation to:</u> <u>Fairbanks North Star Borough</u> <u>Assembly</u> <u>Committee of the Whole</u>

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#### Purpose of the Presentation

- Updates since last year's presentation (2/18/2016)
- Serious SIP
  - Challenges
  - Timeline
  - Potential Additional Controls

## Health Impacts of High PM2.5 Concentrations

- FNSB does not meet health standards. Air Quality Plans or SIPs identify community actions to meet health based standards.
- PM2.5, due to its small size has the following health impacts:
  - Increased respiratory symptoms (coughing or difficulty breathing)
  - Aggravated asthma
  - Development of chronic bronchitis
  - Nonfatal heart attacks
  - Increased visits to medical facilities
- Sensitive populations:
  - Elderly
  - Children
  - Individuals with medical conditions





#### <u>Update - Monitoring</u>

- DEC operating regulatory monitors (FRM) and continuous analyzers (BAM) that are used to call alerts and advisories (July 2017)
- NCore, State Office Building, North Pole Fire Station #3
- FNSB operating the low cost MetOne monitoring equipment (15 deployed)
- Saturation Study



#### <u>Updates - Moderate SIP</u>

- Moderate Area SIP submitted to EPA in December 2014.
- EPA proposed full approval of Moderate SIP. (No conformity freeze.)
- Published in the Federal Register today (Feb 2). Public comment period ends March 6.
- FNSB air quality ordinances in 2015 and 2016 were a critical component of EPA's preliminary finding.

#### Moving Forward

- Serious Reclassification Expected
  - EPA proposed to reclassify in Dec 16, 2016
  - EPA must make final decision by April 28, 2017
- Serious State Implementation Planning (SIP) Challenges
  - PM2.5 Implementation Rule
  - December 2017 Deadline

#### More strict controls will be needed



# **Serious SIP**

#### <u>New PM2.5 Implementation Rule</u>

- New PM2.5 Implementation rule lays out specific requirements for PM2.5 and its precursors.
- Based on the rule, the Serious SIP will be a major effort.
  - Moderate SIP was based on reasonable control measures
  - Serious SIP will be based on best and most stringent control measures
  - Increased amount of documentation and evidence required
  - New rule clarified the requirements to control not only direct PM but also the precursors (NOx, SO<sub>2</sub>, VOCs, Ammonia). So some control measures may be difficult to comprehend by public because they control a precursor vs wood smoke.
  - New rule has some benefits: Precursor Demonstration. Precursor Demonstration Guidance currently out for public comment. A successful demonstration could mean limited or reduced control requirements example ammonia.

#### Serious Nonattainment Area SIP

- Serious Area SIP must:
  - Include all control measures for all sources (area sources, point sources, mobile sources)
    - Unless found to be technically or economically infeasible
    - What has been implemented in other areas sets the level of expectation for the control measure test.
  - Include Best Available Control Technology on all major point sources
  - Demonstrate attainment by 2019, unless an extension is requested.
    - If extension requested, must be included in SIP at time of submittal and include framework for Most Stringent Measures (MSM).
  - Include Reasonable Further Progress (RFP) milestones for PM2.5 and Precursors. Failure to meet RFP milestones triggers contingency measures.

#### Control Measures

- DEC reviewed other states and communities':
  - PM2.5 SIPS
  - Regulations
  - Ordinances
  - Included areas that are in attainment
- Developed a large list of control measures from this review
- Submitted list to FNSB Air Quality program
- List shows control measures from other areas that need to be analyzed and implemented in FNSB.
- Any control measure not implemented will need documentation that it is technologically or economically infeasible OR how an "Alaskanized" measure is equivalent.

#### **Control Measures continued**

- Examples of types of control measures in other areas (not complete list)
  - Curtailment at lower concentration threshold.
  - Date certain removal of all uncertified solid fuel fired devices
  - Surcharge on device sales
  - Installations only by certified installers
  - Require installation of thermal mass for new or existing outdoor hydronic heaters
  - Prohibit advertising of used devices
  - Zero visible emissions during curtailment
  - Registration and inspection of devices to qualify for exemptions from curtailments or to remain in place
  - Prohibit new installation of hydronic heaters or coal fired devices
  - Require sale of dry wood only during late summer to end of winter
  - Prohibit use of used oil
  - I/M program
  - Require only low sulfur oil for all sources (home heating, point sources)

#### **Control Measures continued**

- Three Types of Control Measures BACM, MSM, Contingency
- BACM = 'Best' Available Control Measures
  - Serious SIP requires BACM
  - 'Best' is typically defined by what has been implemented in other areas
  - Challenge will be documenting or coming up with 'equivalencies' between FNSB control measures and Lower 48 control measures and then proving the equivalency for EPA's approval.
  - Control measures implemented before December 2019 and meet the 'Best' test is considered BACM.

#### **Control Measures continued**

- MSM = Most Stringent Measure
  - MSM is a control measure that can't be implemented before 2019, but must be implemented before any new attainment date.
  - MSM's are measures that usually require more lead time to implement
  - MSM framework must be included in a Serious SIP if requesting an extension of the attainment date beyond 2019
  - Only one extension request may be submitted 1 year increments up to 5 years total.
  - Example of a possible MSM date certain removal of all noncertified devices in nonattainment area. Removing all devices by 2019 may not be possible but removing all devices between 2019-2024 may be possible.

#### **Sanctions**

- Sanction Clock starts when EPA determines there has been:
  - Failure to submit a SIP
  - A SIP was submitted and found to be incomplete
  - A SIP has been found complete but is disapproved or partially disapproved
  - A failure to implement a committed measure in an approved SIP
- Three Sanction Clocks
  - 18-months until first sanction likely 2:1 offsets
  - 24-months until second sanction likely federal highway funds
  - 24-months- until Federal Implementation Plan
- Clocks may reset or pause depending on issue and remedy
- These sanctions are in the Clean Air Act



# **Saturation Study**

### Saturation Study

• Goal

Make the needed measurements necessary for evaluating the spatial characteristics of ambient  $PM_{2.5}$  concentrations across the North Pole area during wintertime episodes.

- To identify ambient PM<sub>2.5</sub> concentrations residents are being exposed to beyond the NPFS monitor; and
- To evaluate where a new monitor could be placed, if necessary, to better represent neighborhood scale impacts.

Organization:

- DEC: Technical Assistance. Outreach, Funding, Oversight
- FNSB: Technical Assistance, Site selection, Outreach
- Sierra Research: Project Planning and Management, Data Analysis,
- T&B Systems: Equipment Selection, Data Collection, Quality Assurance

#### Saturation Study Design

- Based on hourly BAM data collected at the NPFS monitoring station from 2013-2015
- <u>Fixed-Site Monitoring</u>
  - Twelve fixed-site monitors will be placed and operated continuously during the study period.
  - Extend roughly 2 miles outward from the NPFS site
- <u>Mobile Monitoring</u>
  - Using a vehicle equipped with a real-time PM<sub>2.5</sub> monitor that will be used for "virtual site" data collection.
  - Data at these fixed locations along the traverse will be accumulated and averaged over the hour to provide hourly average concentrations at the "virtual sites."
  - Provides a very dense network of sites to directly address and answer questions about small scale variations that may be associated with local sources and microscale phenomena in the region.

#### Saturation Study: Equipment and Timeline

- Thermo Personal Data Ram (pDR) Model 1500 samplers will be used for all PM<sub>2.5</sub> measurements
  - Used for stationary and mobile monitoring
  - Same as 'sniffer' vehicle set-up
- 2 Additional meteorological sites
- 3 week study in February
  - Some daily PM<sub>2.5</sub> concentrations > 35 μg/m<sup>3</sup>
  - Some daily average temperatures < -15°F.
- Final report expected by early fall 2017

### Proposed Location of Stationary Sites



#### Proposed Mobile Monitoring Routes





#### Questions?

# Thank You!

For more information: http://dec.alaska.gov/air/anp ms/comm/fbks1\_pm.htm