



# Fairbanks North Star Borough

Office of the Mayor

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September 12, 2008

Mr. Robert J. Meyers  
Principal Deputy Assistant Administrator  
Office of Air and Radiation  
U.S. Environmental Protection Agency  
USEPA Headquarters  
Ariel Rios Building  
1200 Pennsylvania Avenue, N. W.  
Mail Code: 5204P  
Washington, D.C. 20460

Re: PM<sub>2.5</sub> Boundary

Dear Mr. Meyers:

The Fairbanks North Star Borough recently received EPA Region 10's proposed modification of the PM<sub>2.5</sub> nonattainment boundaries recommended by the State of Alaska for the communities in our Borough. According to EPA's letter to Governor Palin, EPA has proposed a substantial modification to the boundaries in part because necessary emissions data, including meteorological data, is currently unavailable. The Fairbanks North Star Borough shares EPA's concern with protecting the health and safety of our community residents; therefore, we believe it is in everyone's interest for the boundaries to be set based on available, reliable data. If the boundaries are unnecessarily expanded due to unavailable data and insufficient scientific information, this will undermine or unnecessarily diffuse the public support for the very hard work that will be essential in the future to correct and control this health problem in our community.

Accordingly, the Fairbanks North Star Borough would like to request, pursuant to 42 USCA 7407(d)(1)(B)(i), that the designation period be extended for up to one year until we are able to gather sufficient information to draw an appropriate boundary. As you may know, both the Fairbanks North Star Borough and the Alaska Department of Environmental Conservation have committed to spend \$2.64 million dollars during the upcoming winter to properly monitor the PM<sub>2.5</sub> problem, including identifying and characterizing emission sources. This, combined with the EPA's funding of an internal RARE grant to model the airflow around Fairbanks which the Borough and the ADEC have committed to support, will generate significant new real data that will substantially

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aid the determination of a boundary that will be meaningful, scientifically based, and not derived from supposition and speculation.

The Fairbanks North Star Borough looks forward to working with you to ensure that we reach an appropriate, defensible boundary, which ensures effective future controls and achievable protection of public health. We understand that in your meeting with ADEC staff last week some concerns were expressed that granting this extension request could lead to similar requests from other PM<sub>2.5</sub> non-attainment communities and complicate efforts to implement the new standard. We believe, however, that the Fairbanks North Star Borough boundaries designation presents some unique and diverse challenges that not only provide ample legal justification for our request but also distinguish our request from other communities. We, therefore, would like to participate in the ongoing dialogue with the appropriate EPA staff members and also explore with you any other options available to our Borough that would achieve defensible nonattainment boundaries.

We will also continue to work with ADEC and Region 10 staff on these issues. To ensure, however, that they are resolved in a timely manner, we would like to suggest another meeting or conference call with you and your staff prior to the deadline for the State's response to the boundary proposal.

We appreciate your efforts to address our concerns about the boundaries and look forward to working with you and your staff to resolve them.

Sincerely,



Jim Whitaker  
Mayor

cc: Alice Edwards  
Acting Director, Air Quality Division  
Alaska Department of Environmental Conservation

Elin D. Miller  
Regional Administrator, Region 10  
United States Environmental Protection Agency