



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Environmental Conservation

DIVISION OF AIR QUALITY
Director's Office

410 Willoughby Avenue, Suite 303
PO Box 111800
Juneau, Alaska 99811-1800
Main: 907-465-5105
Toll Free: 866-241-2805
Fax: 907-465-5129
www.dec.alaska.gov

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Senator Pete Kelly
Alaska State Legislature
State Capitol Room 111
Juneau, AK 99801

Subject: Fairbanks North Star Borough Serious State Implementation Plan (SIP)

Dear Senator Kelly:

As you may recall, the Environmental Protection Agency (EPA) reclassified the Fairbanks North Star Borough (FNSB) fine particulate matter (PM_{2.5}) Nonattainment Area from a Moderate to a Serious Area as of June 9, 2017. This was required under federal law when the area was unable to achieve the national health-based standard for PM_{2.5} by December 30, 2015. This triggered a requirement for development of a new Serious State Implementation Plan (SIP), which must include additional and more stringent actions that will be implemented to improve air quality and achieve the standard by a new deadline of December 2019. We can ask EPA for an extension of that deadline up to December 2024 but that would require implementing even more stringent control measures ("most stringent measures.").

The Alaska Department of Environmental Conservation (ADEC) appreciates the importance of identifying those measures for inclusion in the SIP that will meet federal requirements and protect human health, but at the same time not create unnecessary economic or other burdens on the community. To help assure we are using the best available information and considering all relevant points in preparing the draft SIP, DEC is adding an extra step to the SIP process. On March 22, we're releasing a number of preliminary draft documents, developed as part of the PM_{2.5} air quality planning process, for local input and feedback with the objective of obtaining additional local data and information that will be helpful to preparing the draft SIP. These preliminary documents will show the public our work to date, but will make clear that no final decisions have been made. The public will also have an opportunity to provide their input on the draft SIP again when it goes out for formal public comment this fall.

These preliminary draft documents include a full range of pollution mitigation options. Federal rules applicable to Serious PM_{2.5} SIPs require that all measures that have been used in other parts of the United States be evaluated for technical and economic feasibility in the preparation of the SIP for the non-attainment area at issue. ADEC fully anticipates some options will drop out as the analysis and public dialog progresses. The draft preliminary documents being released include information we presently have to evaluate the technical feasibility and costs effectiveness of various controls that

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might be applied to large stationary sources (part of the Best Available Control Technology (BACT) evaluation we have been working on in collaboration with the local electric power producers) and also includes cost information associated with the use of ultra-low sulfur diesel for home heating as part of the Best Available Control Measure (BACM) analysis. However, ADEC is still working on the economic feasibility analysis for other BACM measures. (BACM apply to sources of PM_{2.5} such as homes and small businesses that are not “stationary sources” under the terminology of the Clean Air Act). It is anticipated that a number of the potential options described in the preliminary documents will not be included in the formal Serious SIP based on further analysis. The feedback ADEC receives will help to inform which of the identified options, or potentially other alternative options, to further develop and discuss with local government and ultimately include in the draft SIP.

Seven documents in total, comprised of both EPA required documents as well as optional supporting documents will be available at: <http://dec.alaska.gov/air/anpms/communities/fbks-pm2-5-serious-sip-development> on March 22. We encourage you and your constituents to review and provide specific information and other feedback on these preliminary drafts. The deadline to provide additional information as a result of these drafts is Wednesday, May 23. Feedback may be provided by emailing: dec.air.comment@alaska.gov. This preliminary release is outside of the formal public review process and therefore, there will be no formal responsiveness summary or public hearing associated with this informal process. Substantive information received may be included in the appendices, final draft documents and cited where appropriate. When the final draft of the proposed SIP is ready for release in late 2018, there will be a formal public review process where ADEC will do additional public outreach and the public will have an additional opportunity to comment before the SIP is finalized and submitted to EPA for its consideration.

I will close with some very good news: The FNSB has been working closely with ADEC to find ways to improve air quality, and the air quality has improved significantly over the last few years as a result of the Borough's and public's efforts, supported by funding from the Legislature, EPA grants and technical assistance from ADEC. Although additional work needs to be done to bring the area into compliance with national health-based air quality standards, ADEC is confident that additional measures can further improve air quality.

My staff and I would be pleased to meet with you or your staff to discuss these early draft documents and the status of the planning process. ADEC staff intend to be available to the local communities and stakeholders to discuss the documents and their preliminary content. The FNSB is considering scheduling a joint work session with the Fairbanks and North Pole City Councils in April to hear more from ADEC about the draft documents and the status of the air quality planning effort.

Best regards,



Denise Koch, Director
Division of Air Quality
Alaska Department of Environmental Conservation