

STATE OF ALASKA

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**DEPT. OF ENVIRONMENTAL CONSERVATION
DIVISION OF AIR QUALITY
DIRECTORS OFFICE**

October 2, 2008

Air Docket
Attn: Docket ID No. EPA-HQ-OAR-2007-0562
Environmental Protection Agency
Mail Code 6102T
1200 Pennsylvania Ave, N.W.
Washington, D.C. 20460

RE: Comments on EPA Responses to State and Tribal 2006 24-Hour PM_{2.5} Designation Recommendations

The State of Alaska Department of Environmental Conservation (ADEC) Division of Air Quality has reviewed EPA Region 10's proposed PM_{2.5} nonattainment boundaries for the communities of Fairbanks and Juneau, Alaska and provides the following comments for consideration. A formal submittal containing additional detailed information and comments will be provided to EPA Region 10 by October 20th as requested in an August 18, 2008 letter from Regional Administrator Elin Miller.

ADEC strongly objects to EPA's proposed boundaries for both Fairbanks and Juneau. We are disappointed in the substantial deviation from the ADEC's boundary recommendations for these areas. The delineations proposed by EPA in Fairbanks and Juneau do not include either borough in its entirety, however they do extend well beyond the more densely populated and industrial areas encompassing large areas with little or no population or pollution-generating activity. While we will be submitting more information before October 20, we still need and request more time to develop and submit updated information and new data we are collecting that will significantly inform the boundary decisions. ADEC notes that under Clean Air Act Section 107(d)(1)(B)(i), the designation period can be extended for up to one year if the Administrator needs additional information. ADEC, in coordination with other governmental agencies, is undertaking monitoring and data gathering activities in Fairbanks and Juneau that will be valuable in making boundary decisions. Invoking the extension period provision would allow for significant new information to be considered in the setting of the nonattainment area boundaries.

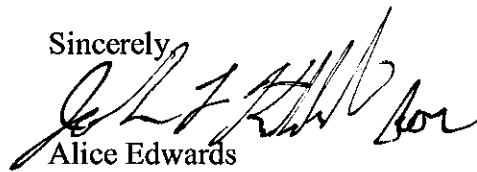
Moreover, the Fairbanks metropolitan planning organization, FMATS, is currently funding an extensive study to characterize the sources of PM_{2.5} emissions and the extent of the Fairbanks problem area. This \$2.64 million project is underway and will continue throughout the coming winter. Data from this past winter's monitoring effort suggests that some changes to the state proposed boundary may be warranted, but not to the extent that EPA has proposed. The FMATS funded project currently underway will bring additional, important information that would substantially assist in the determination of a boundary that is well-reasoned and scientifically based.

For Juneau, several categories of information assembled by EPA to designate the area that violates the ambient PM_{2.5} standard are not representative of local conditions. Flaws in this information appear to have biased the selection of the nonattainment boundary to include areas that do not exceed or contribute to exceedances of the ambient PM_{2.5} standard in the one area of Juneau where monitoring data indicates that concentrations approach the ambient standard.

In closing, we request that EPA withhold any boundary decisions pending further coordination with this agency and consideration of additional information we are in the process of compiling. We also request an extension of the designation period to provide time to complete these efforts.

We appreciate the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alice Edwards', written in a cursive style.

Alice Edwards

Acting Director, Air Quality Division

cc: Joe Balash, Office of the Governor
Michael Tubman, Office of the Governor
Larry Hartig, Commissioner of Environmental Conservation